

UNITED STATES DEPARTMENT OF TRANSPORTATION

**NATIONAL PIPELINE MAPPING SYSTEM (NPMS)
PUBLIC MEETING**

Loews L'Enfant Plaza Hotel
490 L'Enfant Plaza, S.W.
Ballroom A
Washington, D.C.

Wednesday, May 28, 2003
9:00 a.m.

NPMS Panel

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1 P R O C E E D I N G S

2 9:03 a.m.

3 MR. WEISS: My name is Jeff Weiss. I'm with
4 the Office of Pipeline Safety. I'm the director of
5 Program Development, which doesn't say a lot to you,
6 probably, but it covers a lot of areas, including
7 mapping. It historically has covered things related to
8 data improvements and several of the initiatives we're
9 here to discuss today.

10 Today is sort of an interesting opportunity.
11 It's a public forum, really for us to sort of put some
12 ideas out before you and to sort of collect some input
13 from you and ideas that help us better consider what
14 our needs are and how we go about addressing those
15 needs.

16 So it's going to be fairly -- fairly open.
17 We're going to have a structured presentation by Steve
18 Fischer and Sam Hall, who are two GIS guys. They will
19 be leading you through the whole thing. We've brought
20 together a few of the other people from the office in
21 hopes of being able to answer some of your questions.

22 I'll run around the table really quick.

23 Astrid Lopez-Goldberg is with Research and
24 Special Programs Administration's Office of Chief
25 Counsel.

1 We have Mike Israni, who most of you, looking
2 at the crowd as dominantly a gas crowd, will know him,
3 and will have the gas integrity management rule target
4 on his back.

5 This is Roger Little, who I also think many
6 of you probably know. Roger is sort of our IT and our
7 data guru.

8 I mentioned Steve Fischer before, who is our
9 overall GIS program manager.

10 Sam Hall, who is one of our senior GIS
11 analysts.

12 And that's our panel.

13 I will take just a moment, if I can, just to
14 make sure we know who's here. If I can ask for just a
15 show of hands -- I won't ask for names -- about who --
16 who else is here with the feds?

17 (Show of hands)

18 MR. WEISS: I know we have a couple of folks
19 from FERC. We've got one of our assistants in the back
20 room for the RSPA administrator. We have several
21 people who are on the outside who hopefully can answer
22 questions.

23 Who here is with the gas transmission
24 industry?

25 (Show of hands)

1 MR. WEISS: I thought that might bring up a
2 couple of hands.

3 Okay. Gas distribution?

4 (Show of hands)

5 MR. WEISS: Okay. Liquids?

6 (Show of hands)

7 MR. WEISS: Great. And let's see. Any
8 others? We have the inspector general. I've seen
9 someone from that office. I thank you for coming.

10 We have -- anyone from NTSB here?

11 Anyone from the media here?

12 (Show of hands)

13 MR. WEISS: Good. Okay. Well, we know we're
14 -- okay.

15 Well, again, thanks for coming. We're going
16 to try to this very structured in going through the
17 presentation and make sure we get through it. But then
18 we'll be glad to take -- a number of people have
19 contacted us. We'll be glad to take questions and
20 positions and statements from those folks.

21 We're going to ask you when you do speak to
22 make sure you announce who you are and who you're with.

23 We're having the session recorded today. The court
24 reporter will need to get that information for the
25 record.

1 So, I guess, with that, unless there are any,
2 you know, prefatory questions, we'll get underway.

3 MR. FISCHER: Thanks, Jeff.

4 Is this coming through loud and clear?
5 Great.

6 Good morning. As Jeff mentioned, my name is
7 Steve Fischer, and I'm the GIS manager for the Office
8 of Pipeline Safety. I'd like to welcome you to this
9 morning's meeting.

10 Just some additional things to add to what
11 Jeff said. I think the mapping portion of our
12 presentation will probably run about an hour to an hour
13 and a half. We have five people who have sent a
14 request for formal presentations or comments. That
15 probably is going to last anywhere from 45 minutes to
16 an hour.

17 So, we'll have to keep pretty much on a
18 strict timetable here for moving through so we can get
19 finished and wrapped up around noon.

20 Also, we're going to be breaking through the
21 presentations for -- to allow you to ask questions and
22 provide comments to us. So we'll let you know when
23 it's time for you to ask your questions.

24 When you do so, I'd ask that you move up to
25 the front to the microphone and state your name and the

1 company, your affiliation so we have that for the court
2 reporter.

3 (Slide)

4 MR. FISCHER: OPS, as is, you know, the same
5 condition going on for a lot of other companies and
6 agencies, has been building databases over the past
7 years for specific uses and applications. In OPS's
8 case, they've been -- the development of the National
9 Pipeline Mapping System. We've had the databases for
10 inspections, for compliance, for fees, and annual
11 reporting.

12 OPS's long-term goal is to develop an
13 integrated system that is going to start allowing these
14 databases to communicate and allow decision-makers
15 within the Office of Pipeline Safety to make better
16 decisions. As part of that long-range goal, OPS is
17 here today to begin the process of talking about some
18 of the additional items that we would like to consider
19 for collection through the National Pipeline Mapping
20 System.

21 As we move through this process of
22 identifying the items that are under consideration,
23 obviously some of the things that we'll have to take
24 into consideration are issues such as cost benefit,
25 alternatives -- are there alternative databases that we

1 might be able to utilize or alternative approaches for
2 getting us to the same end -- and as well as what is
3 the timeline for the implementation of the collection
4 of this data. If we're going to use a phased-in
5 approach, what will the -- what will the approach be
6 for the collection of any of the information that we do
7 collect.

8 (Slide)

9 MR. FISCHER: There are basically three areas
10 that we'll be focusing on today as far as topics of
11 discussion. The first will be potential changes to the
12 NPMS through a proposed rulemaking. That's going to
13 affect the gas -- natural gas transmission and liquid
14 guys slightly in different ways.

15 For natural gas transmission, we're looking
16 to collect additional attribute information as well as
17 high consequence area data.

18 For the hazardous liquid industry, it would
19 include both additional attribute information as well
20 as requiring breakout tank submissions.

21 And for all operators, it would include an
22 improvement in the geospatial accuracy of the pipeline
23 data that's submitted to the NPMS as well as we want to
24 have a discussion regarding the collection of milepost
25 information to the NPMS.

1 (Slide)

2 MR. FISCHER: Roger Little, then, will be
3 conducting a portion of the presentation, discussing
4 some differences that are being proposed for the -- the
5 Hazardous Liquid Annual Report.

6 (Slide)

7 MR. FISCHER: Then, third, another topic that
8 we want to discuss today is the potential and the
9 future to collect some of the hazardous liquid annual
10 report information as submissions to the National
11 Pipeline Mapping System. And what this would allow us
12 to do would be to -- for the NPMS to do the number-
13 crunching and produce the state-by-state statistics
14 that we're looking to utilize internally for our
15 program needs.

16 (Slide)

17 MR. FISCHER: So, the first area that we're
18 going to get into is, I'm going to lay the groundwork
19 for what we're looking to do in the proposed
20 rulemaking, and then Sam Hall will get up and he'll go
21 into some more detail as far as how that will actually
22 affect the natural gas transmission and the hazardous
23 liquid operators.

24 (Slide)

25 MR. FISCHER: Just a little background on the

1 National Pipeline Mapping System. I'm sure probably
2 most of you are familiar with the NPMS.

3 It's been a voluntary initiative up until
4 December 17th of 2002. At that time, the President
5 signed the Pipeline Safety Act, which now requires
6 pipeline operators, specifically natural gas
7 transmission and hazardous liquid operators to submit
8 pipeline information to the NPMS. Their submissions
9 follow the standards that are currently developed and
10 have been widely available through the NPMS for the
11 past four to five years. The compliance deadline for
12 submission of that information is June 17th, 2003.

13 We currently have, and we've had for quite
14 some time -- statistically, we're right at 100 percent
15 for the hazardous liquid lines, and we've been having a
16 tremendous amount of submissions by the natural gas
17 transmission operators. I believe that we're probably
18 in the 60s and maybe even approaching 70 percent.

19 I do want to point out, though, that even for
20 those operators who have made submissions in the past
21 with the pipeline information, there is a new
22 requirement for the submission of contact information
23 as well, and the deadline for the submission of that
24 operator contact information is also June 17th.

25 If you have any questions, feel free to give

1 either me or Sam a call and we'll discuss the issue
2 with you. Or you can see us at the break and we can
3 discuss it as well.

4 (Slide)

5 MR. FISCHER: The current standards that are
6 being utilized by the national repository for the NPMS,
7 we're basically collecting three different types of
8 information. There's the geospatial pipeline feature.
9 We're also collecting L & G features, but for purposes
10 of this discussion, we're looking at the pipeline data.

11 So there's the linear pipeline feature.
12 There's metadata, which is just descriptive information
13 about the geospatial information. It has the accuracy,
14 the completeness, et cetera. Just basic information
15 about the geospatial information that's being
16 submitted.

17 And then there's attribute information. And
18 the attribute information is there. It's linked with
19 the pipeline feature and it describes the pipeline
20 characteristics.

21 The current standards are -- these are --
22 this is not a complete list of the attributes that we
23 are collecting, but it's the major one. So we're
24 collecting things like operator name, the system name,
25 diameter, which is currently an optional attribute.

1 There are three different commodities that you can
2 specify in your submission. Whether it's interstate or
3 intrastate, and there's a quality code field which
4 basically asks the operator to identify what is the
5 positional accuracy of the pipeline feature that's
6 being submitted.

7 (Slide)

8 MR. FISCHER: So the major question is, why
9 is there a need for a mapping rule. As a federal
10 regulator, OPS needs to know basic information about
11 the pipelines that we regulate. And we're already
12 collecting some of that information through the current
13 NPMS standards, but there are a lot of attribute data
14 that we're not collecting, such as MAOP or MOP or SMYS
15 or class locations or material of construction. So
16 those are some of the data elements that we want to
17 begin talking about as far as the potential for future
18 collection through the NPMS.

19 There are a number of reasons why we need the
20 information:

21 For operator compliance. For our inspection
22 teams and integrity management teams to utilize the
23 information to ensure that operators are complying with
24 federal regulations for pipeline safety;

25 For inspection prioritization. OPS is

1 already using the information with the integrity
2 management teams to assist those teams in their
3 prioritizing of inspections during this process they've
4 been going through for the past year or so.

5 Security. OPS has become greatly involved
6 with pipeline security since the events of 9/11. OPS
7 works with a number of other federal agencies as well
8 as the industry on pipeline security issues, and the
9 addition of this information that we'll be discussing
10 about shortly would greatly enhance our ability in
11 working with other agencies on pipeline security
12 issues.

13 OPS also has a large number of data customers
14 that we provide information to, not only internal --
15 not only internally within the organization in
16 supplying information to inspectors, the integrity
17 management program teams, senior management. We also
18 get a lot of requests -- congressional requests for
19 information, either data at the congressional district
20 boundaries or at state boundaries, et cetera. It
21 varies based on the request coming in from Congress.

22 A lot of times those requests come in for
23 information that we do not have, and we have to push
24 back and say it's not currently available or that, with
25 the problem that we've had up until it was a voluntary

1 initiative -- well, even to this day, it's not 100
2 percent complete.

3 We also are working and providing a lot of
4 information to other federal, state, and local
5 government officials. Most likely, in the -- in the
6 near future, we'll be working even more closely with
7 state and local government officials in providing
8 pipeline information to them for local decision-making.

9 And the last point I want to identify is that
10 the proposed mapping rule is going to provide the
11 framework for how the natural gas transmission high
12 consequence area data will be submitted for the
13 National Pipeline Mapping System.

14 So next what we're going to do is Sam is
15 going to -- it's more of the details -- and describe
16 how -- what OPS is thinking as far as some additional
17 attributes that we would like to collect and what --
18 what their -- what those data elements would be both
19 for the gas and for the liquid operators.

20 Thanks.

21 (Slide)

22 MR. HALL: Good morning. I'm like Jeff. I
23 need to sit when I speak. I do much better when I do
24 that.

25 As Steve said, I will be discussing a lot of

1 the details of what we're looking to collect for the
2 National Pipeline Mapping System. Steve gave you an
3 overview of how OPS envisions the future. I will go
4 into some of the details on how we will actually
5 collect the information, what information specifically
6 we're looking to collect, et cetera.

7 If you would, if you have questions or
8 comments on any of my slides, please note the slide
9 number on the bottom right-hand corner, and we can
10 refer to that slide during comments from the public.

11 (Slide)

12 MR. HALL: We currently use the National
13 Pipeline Mapping System on the hazardous liquid side
14 especially for regulatory oversight, especially for
15 integrity management regulatory oversight. We generate
16 statistics from the National Pipeline Mapping System
17 based on high consequence areas that we provide to the
18 hazardous liquid industry. We generate statistics such
19 as mileage within high consequence areas, mileage per
20 operator, percentage of an operator's system that lies
21 within high consequence areas, et cetera.

22 Because we supply these high consequence
23 areas to the hazardous liquid industry, we can -- we
24 can conduct these kinds of analyses once we have the
25 pipeline data in its current format under the National

1 Pipeline Mapping System.

2 Under gas integrity management, gas pipeline
3 operators are identifying their high consequence areas.

4 And in order for us to conduct the same kinds of
5 analyses that we do for the hazardous liquid industry
6 -- mileage within high consequence areas, et cetera -
7 - we need to collect high consequence areas from
8 pipeline operators because they are identifying them
9 themselves, we are not producing those.

10 (Slide)

11 MR. HALL: This is a general idea of how we
12 intend to use the National Pipeline Mapping System for
13 inspection prioritization. We do similar things now
14 for the hazardous liquid industry.

15 This is a simple equation. It's
16 oversimplified, but I think it illustrates pretty
17 plainly what we try to do with the National Pipeline
18 Mapping System.

19 The first part of the equation is an enhanced
20 National Pipeline Mapping System, which is what we're
21 talking about today. Accurate pipe locations, high
22 consequence areas, and additional attributes, and I'll
23 be getting into that in future slides.

24 The second part of this equation is
25 performance and compliance information: accident

1 history, et cetera.

2 Combining this information gives us an
3 ability to prioritize inspections. OPS cannot be
4 everywhere at once. We need to be able to rank, if you
5 will, which operators we need to inspect first based on
6 their ability to affect high consequence areas. We
7 have limited public funds, we have limited inspector
8 resources, and we need to intelligently inspect the
9 highest priorities first.

10 (Slide)

11 MR. HALL: An example of -- of this equation
12 that I just showed you in practice. You've got two
13 pipeline companies, Pipeline Company ABC and XYZ. Both
14 have 100 miles of pipeline.

15 Pipeline Company ABC has a small diameter
16 pipeline at low pressure. XYZ has a large diameter
17 pipeline at high pressure. ABC has 10 percent of its
18 mileage in high consequence areas, XYZ has 50 percent
19 of its mileage in high consequence areas.

20 The "et cetera" is intended to capture sort
21 of leak history, other compliance information, and
22 things that would be relevant to where we would
23 allocate our resources.

24 The idea here is that obviously you would
25 want to inspect Company XYZ based strictly on its

1 ability to affect high consequence areas. If 50
2 percent of its mileage is in -- is in high consequence
3 areas, obviously that's going to be your first priority
4 in inspection.

5 The key to reaching this is collecting more
6 attributes in the National Pipeline Mapping System. We
7 currently do not have high consequence areas for
8 natural gas and we need to collect those so that we can
9 get this same scheme in a similar scheme that we use
10 for hazardous liquids.

11 A key to this is that none of this would be
12 for public consumption. This would be for internal use
13 only and for internal inspection prioritization. This
14 is not for public consumption.

15 (Slide)

16 MR. HALL: In order to get to where we'd like
17 to go, these are the additional attributes that we
18 would like to collect for natural gas pipelines:

19 Diameter now is an optional field. We would
20 like to require it under the National Pipeline Mapping
21 System.

22 MAOP, maximum allowable operating pressure.

23 HCA segments. That is, identify along the
24 pipeline where the high consequence areas are, where --
25 where the pipeline traverses high consequence areas.

1 Class 3 and 4 segments, SMYS, material of
2 construction, and mileposts, and I'll build into these
3 more in detail.

4 And again, these attributes are for natural
5 gas transmission pipelines, not for distribution.

6 (Slide)

7 MR. HALL: This is a very simple table of how
8 we envision why we need to collect these additional
9 attributes. On the left-hand side of the table, I have
10 regulatory need. On the right-hand side of the table,
11 I have the additional attributes that we feel that we
12 need to collect in order to meet the regulatory need on
13 the left.

14 The first is potential impact circles based
15 on the C-FER equation and area protected. What this is
16 getting at is that we need to be able to characterize
17 how much acreage is protected under gas integrity
18 management. We needed to answer that question for
19 hazardous liquid operators and we need to answer it for
20 natural gas operators.

21 In order to get to that, in order to be able
22 to calculate this -- this potential impact circle and
23 the area that is protected, we need to collect MAOP and
24 diameter, which are the two variables that plug into
25 the C-FER equation to give us a potential impact circle

1 and be able to calculate the area protected.

2 Now, the second general category is for this
3 prioritization of inspections and allocation of
4 resources. And for example, calculating mileage within
5 high consequence areas.

6 In order to do that, we need to collect the
7 high consequence area segments, class locations, the
8 reason that a pipeline segment is in a high consequence
9 area -- for instance, building count, residential
10 building count, or difficult-to-evacuate populations --
11 SMYS, material of construction, and mileposts.

12 These arrows after HCA segments, reason for
13 being in HCA, and class location I'm going to delve
14 into a bit more.

15 (Slide)

16 MR. HALL: Generally, for the purposes of
17 mapping -- for the purposes of this mapping discussion,
18 I have broken down high consequence areas into two
19 basic categories. The first is residential building
20 count high consequence areas. The second is other high
21 consequence areas.

22 The residential building count high
23 consequence areas under gas integrity management are
24 defined, as the rule is currently proposed, as existing
25 Class 3 and Class 4 locations and/or high consequence

1 areas that are identified through a potential impact
2 circle analysis. That's running the potential impact
3 circle up and down the line and counting buildings in
4 that potential impact circle.

5 Other high consequence areas are always the
6 result of a potential impact circle analysis, and these
7 capture the difficult-to-evacuate facilities and places
8 where people congregate.

9 (Slide)

10 MR. HALL: How would operators submit this
11 data to the NPMS? There are several options that we've
12 been discussing.

13 The first would be to submit polygons that
14 represent the actual potential impact circle and that
15 encompasses the pipeline -- the area of the pipeline
16 that runs through the high consequence area.

17 Or, you could submit attributes along the
18 pipeline. That is, segment the pipeline into chunks
19 and attribute each segment of that pipeline with
20 whether it's a high consequence area and why.

21 Or, a combination of both.

22 Any way we handle this, we will still be able
23 to accept hard copy and digital submissions in the same
24 way that we've always done.

25 (Slide)

1 MR. HALL: This is an illustration of what
2 I've just -- what we were just discussing. Imagine
3 these are three different pipelines, three different
4 ways of submitting data.

5 The first -- the top pipeline is the polygon
6 method. You'd have polygons that are a separate layer
7 from the pipeline -- polygons are circles, squares, you
8 know, ovals, et cetera -- separate from the pipelines.

9 It'd be a separate layer in the -- in the geographic
10 information system. And they would represent the high
11 consequence areas.

12 On the left, you have a difficult-to-evacuate
13 circle. That's the potential impact circle, and it is
14 encompassing a difficult-to-evacuate population.

15 The center polygon is a Class 4 location.

16 The last polygon is a place of congregation.

17 It is a high consequence area based on -- on a place
18 of congregation.

19 Another way to -- to submit this data, or an
20 alternative, would be the second line down. You'd have
21 the pipeline segmented into chunks. You're not
22 submitting polygons that represent high consequence
23 areas. Now you're submitting attributes along the
24 pipeline.

25 On the left, you see that the pipeline has

1 been segmented, and the segment here is attributed as a
2 high consequence area, yes; difficult to evacuate, yes.

3 Again, Class 4 location in the center, and
4 place of congregation on the right-hand side.

5 The last option would be a combination of the
6 two. High -- class location is in the center here.
7 The pipeline has been attributed with class location
8 and you would be able -- an operator would submit
9 polygons for other high consequence areas. So, a
10 combination of the two methods.

11 A quick show of hands. Who's familiar with
12 GIS and the National Pipeline Mapping System pretty --
13 pretty intimately?

14 (Show of hands)

15 MR. HALL: Okay, okay. Thank you. That
16 helps me know my audience a bit. Thank you.

17 That pretty much covers what we're looking to
18 collect for the natural gas industry in terms of
19 additional attributes. Now I'm going to cover what
20 we're looking to collect for hazardous liquid
21 pipelines.

22 (Slide)

23 MR. HALL: Hazardous liquid pipelines are a
24 bit different because we're not collecting high
25 consequence area information. There's no need to do

1 that. We're already -- we've already created the high
2 consequence areas and we give those to the hazardous
3 liquid industry. What we have tried to do is marry up
4 the attributes that are common between the two so that
5 there is some consistency between what we're collecting
6 for gas and what we're collecting for hazardous
7 liquids.

8 Again, we'll be requiring diameter. This is
9 for -- this is -- this is what we've been considering,
10 to require diameter, maximum operating pressure, SMYS,
11 material of construction, and mileposts. These are the
12 same attributes that we're looking to collect for
13 natural gas except for the high consequence area
14 attributes.

15 (Slide)

16 MR. HALL: All of the attributes that we're
17 looking to collect for hazardous liquid are for
18 inspection prioritization and the allocation of our
19 resources.

20 (Slide)

21 MR. HALL: Also, for hazardous liquid, we are
22 considering collecting or mandating or requiring the
23 submission of breakout tank information. We worked
24 with API to establish NPMS standards for the submission
25 of breakout tank data. We have standards for the

1 submission of the geospatial data and the attribute
2 data.

3 Currently, all of that data is collected on a
4 voluntary basis. The Pipeline Safety Act does not
5 require the submission of breakout tanks by pipeline
6 operators, and it's all collected on a voluntary basis.

7 We began collecting information in July of
8 2002 and since then, two companies have submitted.
9 They've submitted 17 tank farms comprised of 34 tanks.

10 (Slide)

11 MR. HALL: Why do we need breakout tanks?

12 First, we need to ensure that the data that
13 we have in the NPMS is timely and that it is complete.

14 Under voluntary submission, obviously, the data is not
15 flowing in and we need to make sure that we have a
16 complete database of that information and that it is
17 timely, meaning that if the tanks change hands, the
18 NPMS reflects who is the operator of the tank.

19 Breakout tanks fall under the Office of
20 Pipeline Safety's jurisdiction, and it's critical to
21 know where they are so that we can prioritize
22 inspections for them as well.

23 There's currently no complete repository of
24 breakout tank locations. And something that I'll get
25 into a minute or further along in the presentation, the

1 NPMS data for tanks may substitute for information
2 normally collected through the Hazardous Liquid Annual
3 Report.

4 (Slide)

5 MR. HALL: So I've just discussed what's
6 happened -- what we're considering changing for the
7 hazardous liquid pipelines. Before that, I discussed
8 what we're considering changing for the natural gas
9 pipelines. Those were unique to both of those. Now
10 I'm going to discuss a couple of changes that will
11 affect both hazardous liquid and natural gas pipelines.

12 (Slide)

13 MR. HALL: We're considering improving the
14 positional accuracy of the National Pipeline Mapping
15 System. Currently, the target accuracy for the NPMS is
16 plus or minus 500 feet. That's a football field and
17 two-thirds.

18 We would like to move and we've considered
19 moving toward national map accuracy standards for
20 1:24,000 scale maps, which equates to plus or minus 40
21 feet. So we're talking about a move from plus or minus
22 500 feet to plus or minus 40 feet.

23 Some issues that OPS recognizes that we need
24 to consider are operator cost and effort involved in
25 this -- in this effort to improve accuracy as well as a

1 potential phased approach to lessen the burden on
2 pipeline operators to improve their data.

3 (Slide)

4 MR. HALL: This is a snapshot of the accuracy
5 of the NPMS to date. There is an attribute currently
6 in the National Pipeline Mapping System Attribute Table
7 that tells us how accurate the data is when submitted.

8 Liquid is on the left, gas is on the right.
9 Within 50 feet, we already have 19 percent of the
10 hazardous liquid mileage that's been submitted to the
11 NPMS. That is within 50 feet. On the natural gas
12 side, 12 percent.

13 Fifty to 300 feet, 30 percent of the liquid,
14 62 percent of the gas. Three hundred one to 500 feet,
15 34 percent of the liquid, 19 percent of the gas. Five
16 hundred one to 1000, six and three, and unknown, 11
17 percent on the liquid, four percent on the gas.

18 (Slide)

19 MR. HALL: Why are we considering improved
20 accuracy? For internal purposes, we would like to be
21 able to accurately portray the pipelines in relation to
22 high consequence areas in large part for verification
23 of pipeline operator high consequence area
24 identification. We would also like to provide more
25 accurate data to other decision-makers in the federal

1 government and state government and the local
2 government. Currently, the NPMS is available to
3 federal, state, and local government agencies, and the
4 pipeline data is plus or minus 500 feet. Local
5 government agencies especially can use more accurate
6 data to make better decisions.

7 (Slide)

8 MR. HALL: Now, an example of more accurate
9 portrayal of pipelines in relation to high consequence
10 areas and how we would use that data to verify
11 internally some of the pipeline operators'
12 identification of high consequence areas.

13 This is a hypothetical pipeline. The blue
14 line is the pipeline. The red circle is a 660-foot
15 potential impact circle calculated from a C-FER
16 equation. The pipeline in this image is portrayed 500
17 feet to the southwest of its true position on the
18 ground so this is -- this is typical NPMS data, plus or
19 minus 500 feet.

20 A potential impact circle analysis along that
21 line would not capture this segment as a high
22 consequence area because the house count within that
23 potential impact circle is under 20.

24 (Slide)

25 MR. HALL: Now, if we move to an accurate

1 National Pipeline Mapping System, we can see that if
2 this line is portrayed in its accurate position, we
3 would obviously capture a high consequence area segment
4 here because of the house count within that potential
5 impact circle. A move of 500 feet can negate some
6 segments from being a high consequence area.

7 (Slide)

8 MR. HALL: A bit about the milepost data.
9 You saw earlier that we were considering collecting
10 mileposts for both hazardous liquid and natural gas
11 pipelines. Why?

12 The current National Pipeline Mapping System
13 lacks a "Z" component, lacks elevation data. What that
14 means is that all of the distances that are calculated
15 from the National Pipeline Mapping System are straight-
16 line distances. Imagine taking a piece of string and
17 stretching it out over the United States in a straight
18 line. Those are the distances that are calculated from
19 the National Pipeline Mapping System.

20 Now, if you were to let that string fall onto
21 all the mountains, the hills, fall into the valleys, et
22 cetera, that string's distance would change over the --
23 over the length of the United States. Mileposts would
24 help us get to more accurate measurements of distance
25 because we can count mileposts over a distance as

1 opposed to calculating straight-line mileages from the
2 National Pipeline Mapping System.

3 Some questions that we need to have answered
4 is -- are, do all or most operators maintain milepost
5 information currently in their -- in their mapping
6 systems, and how difficult would it be to provide
7 milepost data as an NPMS submission?

8 Another question that we'd like to have
9 answered is, how are operators currently collecting and
10 maintaining class location information? Is this based
11 on high consequence -- based on mileposts? And how in
12 the future would operators intend to maintain high
13 consequence area information if we don't move to a more
14 accurate pipeline system, a more accurate NPMS? Would
15 pipeline operators maintain that information based on
16 mileposts or how would that information be tied to
17 segments of the pipeline? These are questions that
18 we're looking to have answered.

19 (Slide)

20 MR. HALL: We are considering also -- this is
21 an internal move -- this likely would not affect
22 external submitters to the -- to the National Pipeline
23 Mapping System -- an internal move to a -- to a model
24 of dynamic segmentation. This is also known as linear
25 referencing. And all it is, is maintaining information

1 based on a measurement system over the pipeline.

2 For instance, mileposts. If you wanted to
3 attribute the pipeline, you would say for Milepost 2 to
4 5, the diameter is 16 inches; from Milepost 5 to 20,
5 it's -- it's 20 inches. That's all that linear
6 referencing is.

7 It has advantages for us internally because
8 it would mean less segmentation of the pipeline.
9 Linear referencing does not require in a GIS model --
10 it does not require you to segment the pipeline and
11 break it up into -- into multiple segments and
12 attribute each segment of the pipeline. It really
13 eases data integration internally and it helps us
14 maintain historical information because we can flag all
15 the data that we collect on this linear referencing
16 system with a date so that in any given point in time,
17 we can -- we can look at the pipeline system as it
18 existed on any given day in history in terms of
19 ownership, material of construction, and those types of
20 things.

21 Some of the challenges that we face in moving
22 to a dyn seg model, or a linear referencing model, are
23 really based in operator submissions of the data. How
24 would we incorporate operator submissions into a
25 dynamic segmentation model? We certainly would need to

1 continue to collect hard copy information and we would
2 not want to require operators to move to a dynamic
3 segmentation model in their GIS in order to be able to
4 submit this information.

5 I'm going to pass now to Roger Little.

6 Oh, excuse me, yeah. We -- we need to break
7 for questions. We'll discuss everything that came
8 before this, and then we'll move on to Roger.

9 MR. WEISS: Thank you, Sam.

10 Just a procedural issue. It's starting to
11 pack up in the back. Really, there's plenty of space
12 up here. This isn't a formal presentation. You're
13 welcome to come up here. If anybody else comes in,
14 send them down. Make them sit at the table or we can
15 -- chairs in and put them on the side. We don't need
16 to get too uncomfortable back there. So feel free to
17 adjust yourself.

18 Are there questions or comments? Marty?

19 MS. MATHESON: I'm Marty Matheson with the
20 American Petroleum Institute.

21 On the accuracy, your -- your diagram showed
22 the pipe -- the accuracy of the pipeline in
23 relationship to the HCA. How accurate is the HCA
24 information by comparison to the pipeline information
25 underlying it? For the liquid high consequence areas,

1 my guess is the HCA data is in fact less accurate than
2 plus or minus 500 feet. So if you move the pipeline,
3 it doesn't necessarily mean that you've got a more
4 accurate on-the-ground depiction of what's there.

5 MR. HALL: You've hit on a good issue.
6 Typically, the high consequence areas for liquid are
7 plus or minus 80 meters, which equates to 240 feet. An
8 inaccurate pipeline data set really just begins to make
9 that inaccuracy worse. This is for -- this is for
10 hazardous liquids. And the reason is that if you have
11 plus or minus 500 foot pipeline data and plus or minus
12 240 foot high consequence area data, you have a
13 potential inaccuracy of 740 feet because if they're
14 both off by their -- by their maximum amount, you could
15 have potentially off by 740 feet.

16 If you improve the pipeline data, you would
17 at least improve -- you would at least improve on that
18 margin of error.

19 Now, for that natural gas operator, improved
20 accuracy is more important because you're looking at
21 much smaller potential impact areas than you are for
22 the hazardous liquid industry.

23 MS. MATHESON: Okay. Just a follow-on to
24 that. The 1:24,000 scale you're looking at the USGS
25 Quad 7 quads. Would you talk about the age of the

1 quads and their accuracy as well? I mean, my
2 understanding is many of those are as many as 40 years
3 old and the revision cycle on them is somewhere in the
4 20- to 30-year range.

5 So, again, I would say that you're probably
6 not increasing your accuracy of what you see on a map
7 by changing the accuracy of the pipeline information.

8 MR. HALL: That question assumes that we
9 would be using only the USGS topo quads as our base
10 map. We have available to us some other data sets that
11 are constantly updated that portray difficult-to-
12 evacuate populations and places where people
13 congregate. And we also potentially have available to
14 us aerial photography that is much more up-to-date and
15 is updated much more frequently than the USGS topo
16 quads.

17 MS. MATHESON: What are you currently using
18 as the base for NPMS?

19 MR. HALL: Multiple data layers, all -- all
20 of the above that I just mentioned.

21 MR. WEISS: Marty, I wonder if I could just
22 add to that.

23 I think it's a good -- I understand your
24 point. It's a good point. Part of what I would say,
25 going back to one of Sam's points in his slide about

1 inspection prioritization, with liquid operators, going
2 from liquid to gas, it almost quadruples the number of
3 operators that we need to oversee along with our state
4 partners. So, I think we should all understand with
5 any map, anywhere you go, you know, you're not going to
6 have absolute accuracy. What we're seeking is improved
7 accuracy so that we can allocate resources a little
8 more efficiently.

9 As we move into the gas -- I mean, to answer
10 your question, will we ever have absolute accuracy?
11 No, that's the operator's responsibility. What we're
12 trying to do is make sure that we have enough accuracy
13 so that we can allocate the limited resources we have
14 in the most efficient way possible.

15 As you can see from Sam's example, if that's
16 compounded across the whole system, eventually we end
17 up with a solution. We think we're doing, you know,
18 the right thing in trying to prioritize limited
19 resources and allocate those to the public benefit and
20 maximum public benefit that, you know, it's not a very
21 effective answer.

22 So, I mean, really, what we're here to do,
23 and I think if I can take the opportunity to say, is to
24 discuss these points. This is a public workshop to
25 just debate issues, get them out in the open, make sure

1 we understand them. We'll also post the presentation.
2 We can post it on the NPMS web site so you can have
3 reference to it later.

4 MS. MATHESON: Just one more question while
5 I've got the mike on accuracy. What is the unit which
6 you are managing your resources? In other words, how
7 small a unit has to be the decision point? In other
8 words, are you deciding on a regional basis on the --
9 on prioritizing resources? Are you doing it on a state
10 basis? Are you on -- doing it on a county basis? What
11 is kind of the unit for managing resources?

12 MR. WEISS: Ours is more of a system
13 prioritization. It's not to say that working with
14 state partners, you know, that they -- particularly
15 where it's purely an intrastate and we have an
16 intrastate program. That's going to be of, you know,
17 relevance to them.

18 But when we look at what Sam was describing
19 for you, it was an attempt to look nationally and to
20 say -- by the way, I want to jump in and just want to
21 say that this is not an attempt to generate a
22 scorecard. That's not what it is. It is strictly --
23 no one would use it in that basis.

24 What it is, is an attempt to try to allocate
25 limited resources. So you have to have a model to go

1 by. You can't go and just throw your hands up and say
2 whoever is biggest. As Sam pointed out to you, you can
3 have two operators of equal dimensions to the -- to the
4 eye who obviously create a different potential risk
5 profile.

6 And so I think the question we're inviting
7 comment on is, do you think that it's reasonable for a
8 public safety agency to allocate its resources in that
9 way. I recognize it's not the perfect answer, it's not
10 a scorecard. It's just a starting point for
11 inspection.

12 MS. MATHESON: The reason I asked is, how
13 accurate does it have to be for you to determine
14 whether a system should have -- one system should have
15 priority over another.

16 MR. D. JOHNSON: Dave Johnson with Enron
17 Transportation Services.

18 On this slide again, I think one of the
19 points he made on -- in talking about this slide was
20 that you need to be able to determine high consequence
21 areas and -- and you would miss them.

22 On -- we're a natural gas transmission
23 operator. Got about 9000 miles that we operate. For
24 natural gas transmission lines, the way HCAs are
25 defined is relative to the pipeline, not by other

1 features. So regardless of -- of any positional
2 inaccuracy in the pipeline, the HCAs will be determined
3 accurately because they are determined on the ground
4 with survey information that is referenced to the
5 actual location of the pipeline. So that's -- that
6 reason really is not -- not very relevant to natural
7 gas transmission lines.

8 Another comment that you made early, I think
9 -- I think -- the I don't think the slide had a number
10 on it. It was either 15 or 16.

11 (Slide)

12 MR. D. JOHNSON: Yeah, next one. Because it
13 wasn't 14.

14 (Slide)

15 MR. D. JOHNSON: On one of these, one of the
16 comments that you made was you need to -- you need this
17 information to determine what area -- the acreage
18 that's being protected by the system or by the
19 integrity management plan. One of the things I think
20 that -- that we really need to point out and you need
21 to keep in mind as you're doing this because there are
22 going to be obvious comparisons between the natural gas
23 transmission numbers and the hazardous liquid numbers
24 and that obvious difference is the difference in
25 behavior of the fluids transported.

1 So, the -- the high consequence areas for
2 hazardous liquids, the areas that need to be considered
3 tend to be much larger than the HCAs for gas. So I'd
4 just urge recognition of that when you're doing the
5 statistics.

6 Slide 30.

7 (Slide)

8 MR. D. JOHNSON: Okay. The "Z" data and the
9 mileposts. Well, I can't speak for -- for the other
10 guys in the industry, but I know, typically, for a lot
11 of the companies that -- a lot of the systems that we
12 operate now or have operated, the mileposts are not
13 intended to be accurate, every mile of pipe there's a
14 milepost. They are reference numbers. They are
15 sometimes used, like, you know, you see the numbers on
16 the aerial markers and that kind of thing. They are
17 reference points. The distance between those may be
18 more or less than a mile. The pipe may have been
19 rerouted or modified due to some construction or
20 something. Those mileposts don't change.

21 So, if you're going to try to get -- you
22 know, do something with the "Z" for actual mileage,
23 that's not the way to do it. You're just going to be
24 spending a lot of time and effort and -- and not hit
25 your target.

1 I would suggest that perhaps another way to
2 do it with all the data layers that you're doing is
3 when you lay these pipelines on the USGS quads with the
4 topo features on them, you turn the -- turn the topo
5 into a little geometry on that.

6 MR. WEISS: That was the point I was going to
7 raise. I appreciate your bringing that up. Because,
8 really, part of -- you're really reacting now mostly to
9 the presentation. I know that you had a presentation
10 you want to do later, but --

11 MR. D. JOHNSON: No, I just wanted to be able
12 to make comments.

13 MR. WEISS: Sure. But one of the things that
14 we're inviting is discussion of alternatives. You
15 know, alternative ways of achieving sort of the same
16 objectives. So we welcome that and thank you for that
17 comment.

18 MR. FISCHER: Excuse me. One of the things
19 that I'll add to that is, we certainly -- is that we
20 considered using topographic information and draping
21 the pipeline is one alternative. So that -- that's a
22 good idea.

23 The question I have, though, is how do you
24 determine then the overall length of your pipeline
25 systems? If the mileposts aren't the measure for the

1 overall length, then how -- how would you, as an
2 operator, do you determine that?

3 MR. D. JOHNSON: When -- when they're built,
4 there's an as-built survey and typically, I think a lot
5 of operators have that in engineering stationing.
6 Their as-built stationing may or may not include
7 equations. Some operators push the equations out at
8 the end. Some maintain the survey equations in the
9 center. But it's then -- from the as-built surveys of
10 the pipelines, it's actual footage of pipe laid.

11 MR. FISCHER: Before you go, I have a
12 question, too. You had mentioned that the high
13 consequence areas are identified based on land surveys,
14 you know, in the field. And my question is, and it's
15 not something you need to answer now but something that
16 we're looking to discover, is, how do you maintain that
17 information in a geospatial way? How do you know which
18 segment from where to where is actually considered a
19 high consequence area and how do you tie it to a
20 mapping system or to some type of database? Or is it
21 based on mileposts or is it based on --

22 It's something that we're looking to discover
23 because we don't understand how it would be done in a
24 mapping system in another way, how you would submit
25 high consequence area to an inaccurate mapping --

1 MR. D. JOHNSON: Again, different operators
2 have different degrees of sophistication in their maps
3 and GIS implementation right now. There are probably a
4 lot of operators whose map bases are all on paper and
5 who are maybe just starting to think about electronic
6 map bases, which lets you do all kinds of things.

7 But again, the pipeline will have engineering
8 stationing along the pipeline and you will have known
9 reference points, like all the valve settings, all the
10 CP stations, all the crossings of all sorts, just --
11 you know what the stations of those are.

12 So, when you're doing the survey work for --
13 to determine HCAs, it's very much akin -- it's the same
14 survey work that -- that we do, maybe expanded a bit
15 and you do some more things, but it's just like doing
16 our class location surveys. That is typically
17 referenced to, you know, an offset -- you know, at
18 Station XYZ plus AB on the pipeline, there's -- there's
19 something 172 feet right. So you do all those and then
20 you can -- once you've got all those placed, you can do
21 the analysis so you have the stationing number on the
22 -- the pipeline which -- which, you know, may or may
23 not correlate very well with the mileposts.

24 I know we have places on our system where the
25 mileposts are more than a mile apart, some that are

1 less than a mile apart, again for various reasons. But
2 those are not typically used by a lot of operators as
3 accurate distance or separation references.

4 MR. WEISS: You have the lat and long for the
5 engineering stations, so then you know when you're
6 measuring -- you're measuring from a known reference
7 point a specific distance from --

8 MR. D. JOHNSON: We will -- we will have
9 that. We don't now because we're building that system,
10 but that's not currently available. And -- and I'm
11 sure it's not for -- some operators, yes, others, no.

12 MR. FISCHER: A problem we have is trying to
13 find a way to capture high consequence areas on
14 pipelines. So, we are interested in suggestions that
15 pipeline operators and the members of the public might
16 have as to how we can collect that information based
17 on, you know, how easy it's -- how easy it is to submit
18 that information to us based on how you collect it.
19 And right now we're looking at an improved accuracy of
20 the National Pipeline Mapping System and we would
21 certainly consider alternatives to collect that
22 information.

23 MR. D. JOHNSON: If the increased accuracy
24 for the majority of operators that -- I didn't write
25 down that slide number. But the table where you had

1 the accuracy numbers down. For the operators that are
2 not in the less than 50 foot interval now, if they have
3 to go out and -- and resurvey -- you know, reset a line
4 and -- to that accuracy standard, literally thousands
5 and thousands of miles of pipe, that's -- that's going
6 to take some doing. It's not a simple task and it's
7 not cheap.

8 So I think we need to -- as we move ahead, I
9 think there needs to be general understanding and
10 agreement as to the benefits that are going to accrue
11 from this. And I think the industry needs to see some
12 of those benefits flowing back to it as well because
13 we're going to be the ones that have to expend the
14 resources to do that, and that's resources that could
15 -- you know, there are competing tasks for those
16 resources.

17 So this -- you know, we would -- we would
18 have to be convinced that this is a very high priority
19 task that's worth the expenditure of those resources at
20 this time.

21 MR. WEISS: Thank you for your comment.

22 Sir, in the front?

23 MR. BOSS: Terry Boss with INGAA. I
24 apologize for not being at your last presentation as
25 this was discussed.

1 I think -- a couple things I want to point
2 out. I think there's a lot of legacy information that
3 seems to be missing here. This reminds me of deja vu
4 of the original mapping discussions we had in the Map
5 QAT 1 team and about the separation of operational
6 information from knowledge information. We went
7 through a lot of these discussions before in Map QAT I
8 on what was pertinent information from a management
9 viewpoint of OPS and what was going on in the
10 companies.

11 And a lot of the data that we are designing,
12 say, for the integrity program is already designed to
13 help in prioritization. We have all the annual
14 reports, the 30-day reports, the four factors that are
15 going in that can help prioritize what the companies
16 are doing and where they're doing things at.

17 We had previously submitted that we'd say
18 we'd give you the segment information on where the HCA
19 is, but from the drift of the conversation I'm hearing
20 here, it sounds like OPS is starting to sound like they
21 want to operate the pipeline systems.

22 And I would like to go back -- I know you
23 used to have it on your web site, the report on the Map
24 QAT I team. I looked this morning, it is now gone. I
25 think you probably need to go back and look because it

1 had a lot of that information on how this location
2 information was put together, how the pipelines do it.

3 It answers a lot of the questions and the people that
4 were in those discussions originally that you're
5 bringing back up again. That's available, and there's
6 a few of the folks in the audience who did participate
7 in that effort.

8 But I think you should relook at that
9 information. There was a specific reason why we ended
10 up with that data set, and that was to get as much
11 information so that you could depict the system to the
12 Congress, to your constituencies, and yet it was not an
13 overload on the pipeline operators and a management
14 problem of trying to keep this data up to track. It's
15 a horrible problem to keep all this data straight from
16 the base maps to the pipelines, the continuity of that
17 information.

18 Right now I see that you're submitting data
19 -- whole data sets over again, and I'm confused on
20 how you can, you know, have linkages in your databases
21 when you continually get a new set of data every year
22 coming in. It looks -- sounds confusing to me on how
23 you maintain those linkage relationships if you're
24 getting all new data every year on something like that.

25 MR. WEISS: I think we'll address that point

1 coming up. You know, in -- I don't know. Steve --

2 MR. FISCHER: Going back to Terry's last
3 comment, that's currently the problem, is that we're
4 not maintaining historical information about the
5 pipeline information that's submitted to the NPMS.
6 It's all snapshots in time because the current data
7 model that we've -- that we developed years ago does
8 not allow us to maintain that historical information.
9 So that's one of the problems we're currently facing as
10 we move forward to try to develop more of an integrated
11 system.

12 And that's why Sam was talking about the
13 potential in the future for moving to a dyn seg model
14 that would allow us then in the future then to begin
15 collecting and maintaining historical information on
16 these pipeline systems.

17 MR. WEISS: I guess the only other comment
18 that I would register -- Andy, there's somebody right
19 before you I think wanted to talk, and then maybe go to
20 Andy.

21 Just to comment on Terry, I don't remember
22 the dates of MQAT I, but I want to say that was eight
23 to 10 years ago.

24 Pardon?

25 MS. MATHESON: '95.

1 MR. WEISS: '95? Okay. Well, getting in the
2 eight range and up.

3 The things that we've tried to portray today
4 and just really to get out for comment and discussion
5 because that's the purpose of today's meeting, the one
6 thing I would say to you, Terry, is that our world has
7 shifted dramatically in that period of time. We did
8 not have integrity management. Some of the drivers
9 that are there on a regulatory basis were not present
10 when we did MQAT I. We built MQAT I. We went into a
11 voluntary system. That lasted up until December 17th
12 of last year, and the Congress took the initiative to
13 make it a requirement. You know, we can all conjecture
14 as to why they did that, but I would just say that I
15 recognize -- you did have many good points.

16 We'll go back and look at the MQAT I and see
17 what information we can gather from there, but I would
18 say that as a regulator, our life is not static. It
19 has changed dramatically since MQAT I. And you know,
20 what we're trying to propose and get out for discussion
21 right now are the difficulties of implementing a system
22 that will help us reflect current realities.

23 I think there is a strong initiative out for
24 both increased effectiveness at a federal and a state
25 level on oversight on pipeline safety. So what we're

1 trying to tell you in large measure today, I think, and
2 to have out for discussion are the kinds of elements
3 that we think would enable us to do that and really to
4 allocate resources where they need to be allocated
5 first.

6 Operators who are doing well from a safety
7 standpoint, who know their business, are operating
8 safely, you know, it seems to me that it works to their
9 advantage. Where we're really shifting our focus is on
10 operators who are creating a higher risk profile.

11 Remember, it's only a starting point for this
12 stuff, for us. It's a starting point, it's not an
13 ending point. It's where we start in the oversight.
14 Just because you start there doesn't mean that an
15 operator is not perfectly capable of conducting their
16 business and doing well, but it's a starting point for
17 us in oversight.

18 So, with that said, I think --

19 MR. HANSSON: Shawn Hansson with Shell
20 Pipeline. Just a couple of nuts and bolt things.

21 On the mileposts, pipelines generally are
22 Milepost 0 to the end of the line in order, but that's
23 not always true. There are lines where it starts at
24 zero in the middle and increases both ways, it starts
25 at zero on both ends and meets in the middle and all

1 that kind of thing. You'll just get in a huge data
2 management issue if you start looking at mileposts.

3 So, some alternative to that, one of which
4 might be just an attribute that's the length of the
5 line. You know, just submit the whole line and say
6 this is how long it is.

7 You talked about using that to get the
8 length, and I think if you look at an overlay on the
9 elevation model, you'll find out that it only changes
10 about one percent when you start considering elevation
11 effects. So, you know, to manage all that data to get
12 one percent accuracy, I wouldn't advise it.

13 Also, on the question of accuracy relative to
14 HCAs, I think what you'll generally find is that the
15 more populated area you're in, the more accurate the
16 location of the pipeline is because you have more
17 landmarks: houses, road intersections, all that kind
18 of thing. So even though the operator's reporting plus
19 or minus 500 feet, where you're in an area that might
20 affect an HCA, it'll be much better than when you're
21 out in a farmer's field or prairie somewhere, it won't
22 be as accurate.

23 MR. DRAKE: My name's Andy Drake with Duke
24 Energy Gas Transmission out of Houston, Texas.

25 I appreciate you guys calling this meeting.

1 It kind of caught the TPSSC off guard a little bit when
2 the issue came up and it was really unclear what your
3 purpose and what you're trying to accomplish. And I
4 think it resulted in a lot of -- a lot of spinning of
5 the clutch kind of things.

6 But there's a lot to talk about here. I
7 think Terry brought up a good point, the Mapping One
8 Initiative. We were a party to that and we think that
9 the mapping initiative is a positive event. But that
10 tool -- I think it has to be very clear what we're
11 trying to execute and how the engine runs before we try
12 to change it and make it go somewhere else.

13 If you can back up to your slide about the
14 HCA definition example I think I can explain -- that
15 right there.

16 (Slide)

17 MR. DRAKE: The history of the industries is
18 very different. The gas industry has had a legacy of
19 class location requirements since its onset in 1968.
20 We've been obligated to keep track of that well in
21 advance of GPS and satellite technology. The way that
22 the industry has functioned is that we don't rely on an
23 outside database to tell us where the houses are, which
24 is different than the very function that you're
25 providing the liquid group, where you are defining the

1 HCAs to them. The gas industry has had an obligation
2 to define the housing around it at very -- very
3 precise, you know, very highly resolute databases to
4 make those classification determinations for 45 years.

5 The way that that has been executed over time
6 is that the pipeline is the center of the universe to
7 us. It is a physical, known landmark. And what we do
8 is, everything is referential off the pipe itself and
9 physically chained in. You ask how we keep that
10 updated. We don't update it by -- by securing
11 additional databases. We update it by physically
12 walking on the pipeline or flying on the pipeline or
13 photographing aerially the pipeline, none of which
14 necessitates any geospatial accuracy period. It's all
15 referential to the center line of the pipe, period.

16 So, to us, where that -- the interesting
17 thing there is that the pipe and its relationship to
18 those houses is extremely accurate. We've been audited
19 against that for a long, long time. Is it correct,
20 yes.

21 But where that piece of paper is, the pipe
22 and the houses are relationally correct. But where
23 that piece of paper is in the real world, we have no
24 idea to any accuracy other than -- I mean, many of us
25 do. I mean, but there -- we have not been accountable

1 for that relational accuracy of where that is in the
2 world. Is it XY, lat-long of plus or minus 500 or
3 plus or minus three. We're on our third generation
4 GIS, and I can tell you the level of effort ramps up
5 non-linearly as you try to drive down to geospatial
6 accuracies from plus or minus 500 to 40 to three.

7 We are moving towards plus or minus three
8 because of other business values that we have,
9 particularly around one call. It helps us ferret out
10 one calls much faster and much more precisely and cuts
11 down our work load around one call responses, which is
12 a business event for us.

13 But most of the industry is in a different
14 place than that and for very good reasons. They
15 haven't needed to do that. But the costs associated
16 are significant, and I think it's fundamentally
17 important to understand where their industry has been
18 and where they're coming from. They have -- they don't
19 need an outside data source to tell them where the
20 houses are. They've been accountable for it. They
21 don't need to know where the house is in an XY lat-long
22 to any degree of precision. They only need to know
23 where it is with regard to the center line of the pipe.

24 So when you start now saying you want to lay
25 over data on top of it, you're fundamentally talking in

1 a different language because they don't need and never
2 have needed to lay other data sources on top. So they
3 don't -- they're not geospatially rectified at any very
4 highly level of resolution. And so fundamentally,
5 that's going to be a pretty big rub. So I think we
6 need to back up and ask, what is the purpose of -- what
7 are we trying to accomplish again.

8 The operators, I think, can provide this
9 information. They're not looking for you to provide it
10 backwards. The DOT has the audit function at the field
11 inspection levels to make sure that we're doing that
12 correctly. And then the operator is accountable to
13 post it to the DOT. The DOT is certainly isn't
14 obligated -- you know, has the opportunity to audit us
15 on that effort to make sure that it's being done
16 correctly, you know, thoroughly, all those kind of
17 things. But the operator may actually provide DOT with
18 the map that shows the HCAs with, you know, with a high
19 level of precision for the -- for the determination of
20 the HCA itself with respect to the pipe.

21 You know, I think then we just need to know
22 from you more clearly what other purposes you need that
23 involve the laying of other data, which is now an issue
24 of resolution and geospatial accuracy, are out there
25 because the operators may also have some of that

1 information. They may need to push it forward.

2 But you know, some of this information, back
3 to Map One. I think Terry brought up a great point.
4 Go back and revisit some of the discussion items. Some
5 of the data issues explode radically on this thing.
6 SMYS, for example.

7 I think a lot of people that are laypeople in
8 the industry think that pipes are very linear and that
9 -- you know, and some of the data is. For long
10 distances, the diameter is the same. That's not a big
11 deal. It's a 24-inch pipe for a long way. The MAOP.
12 Long way. SMYS can change hundreds of times in a
13 discharge.

14 What's the -- what's the point here? It just
15 quadrupled the amount of -- or, you know, linearly
16 exploded or non-linearly exploded the amount of data
17 we're carrying around for what? You see what I mean?
18 The pipes aren't that homogenous, that contiguous, and
19 I think we need to be real careful about what data we
20 want to tow along.

21 And I think just to close that, we are
22 supportive of the mapping tool. We think it is
23 valuable. We think it's valuable as a dialogue between
24 us. We all remember the San Jacinto Bay and, you know,
25 the flooding issues there and the need and the

1 confusion around who was in the basin and all that good
2 stuff. We all understand the need for a map. We all
3 understand the need for some level of precision, but we
4 have to -- we have to be very careful with just adding
5 on, adding on, adding on because I don't think we can
6 accomplish our function.

7 I've been a little surprised that Roger's so
8 quiet because, fundamentally, the focus on inspecting
9 in Class 3s and 4s is very surprising to me. With the
10 gas industry, you've got a double dipping of safety
11 benefits in the Class 3 and 4 with the class scheme and
12 now an HCA area -- you know, inspections in the Class
13 3. Statistically, I think it shows the Class 3s and 4s
14 demonstrate an extraordinarily different safety
15 performance than Class 1 and 2.

16 So, the fact that you want for gas -- because
17 of the class scheme. So the fact that you want to
18 focus there is fundamentally kind of alarming to me.
19 That's maybe not what you want to do, but --

20 MR. WEISS: Part of the reason Roger's been
21 quiet is that we haven't gotten to his part of the
22 presentation yet. We sort of stopped at that point.
23 But again, we're here to take comments.

24 Michael?

25 MR. ISRANI: Mike Israni, Office of Pipeline

1 Safety.

2 The SMYS information we have included in data
3 collection because we are considering having different
4 intervals for different SMYS levels of the pipeline.
5 So that way we'll have information on which segments of
6 the pipeline are coming after what interval.

7 MR. DRAKE: I think that there's other ways
8 to accomplish that, and I think that's why we need to
9 talk. The intervals could -- I mean, literally, you
10 could have 40 different intervals in one HCA. That's
11 berserk. None of us want to engage in that discussion.

12 MR. ISRANI: We are ready to hear any
13 recommendations that industry has on that.

14 MR. DRAKE: Okay. I think -- what I hear is
15 that this is the beginning of a dialogue and we're not
16 going to try to solve it at this moment, but those are
17 the kind of issues we need to talk about, how they play
18 forward. Because they can really drive the burden of
19 this wildly out of sight and add very, very little
20 value.

21 MR. WEISS: And I think that that's what
22 we're interested in pulling from you and other people
23 who speak here, is that what we have here are, again,
24 points of discussion. This is way before a rulemaking
25 that would take place, you know, a potential rulemaking

1 on mapping.

2 We think we understand the business drivers
3 at our end. What we don't fully understand are the
4 business drivers at your end and the difficulties of,
5 you know, providing certain information. So we're
6 particularly interested in hearing about, do you have
7 it. You know, A, if you don't have it, you know, what
8 are the difficulties with providing it and the cost
9 associated with it, because as you said, that all needs
10 to go into the overall factoring of, do all those
11 factors stay on, do some of them drop off, they're too
12 difficult to achieve, they're not the highest priority
13 ones.

14 So, I think we were fairly clear in what our
15 business needs are. We've sort of given you the
16 universe of ideas that we have thought about, and so
17 appreciate your comments and specifically ideas on
18 alternatives for achieving that.

19 MR. DRAKE: Okay. Yeah, it -- it can be
20 extraordinarily expensive. Not just a little
21 expensive, it can be extraordinarily expensive and not
22 very productive if some of this information is already
23 existing in different formats. So, thank you.

24 MS. WALKER: I'm Nazie Walker with Washington
25 Gas.

1 I have a question about the lack of "Z"
2 component that you were talking about. We do have GIS
3 systems in Washington Gas. We operate about 170 miles
4 of transmission line. Last year, we did a study that
5 we were comparing our information in our GIS system
6 versus the as-built. The percent difference was plus
7 or minus two.

8 What percentage do you think is acceptable?
9 Have you done a pilot study to know what the difference
10 would be, and what do you think would be acceptable?

11 MR. FISCHER: We haven't done a pilot study
12 to determine what the -- what the percentage difference
13 would be based on elevation data. Our goal in asking
14 for that elevation data is to try to more accurately
15 portray the lengths of pipelines and pipeline systems
16 in the nation. We haven't discussed internally what
17 percentage error would be acceptable for our purposes,
18 and you raise a good point, and I appreciate your
19 comment. But it's not a question I can answer right
20 now.

21 MR. WEISS: Just a procedural check, if I
22 can, then we'll go to you. I apologize for the delay.

23 I want to make sure that we get through, and
24 you just need to flag us and we'll go on --

25 MR. LITTLE: I think we're doing fine.

1 MR. WEISS: Okay. Good. Great. Thank you,
2 sir.

3 MR. J. JOHNSON: Jay Johnson with Enbridge
4 Pipelines.

5 Maybe if you go to Slide 21 in the --
6 (Slide)

7 MR. J. JOHNSON: You know, some of the
8 additional needs for liquids pipelines, MAOP and SMYS,
9 those are -- I mean, we have a system where
10 approximately 45 miles between pump stations and yet we
11 can have four or five pump stations between trap-to-
12 trap segments. We've got an integrity management rule
13 that wants us to manage the integrity of our pipeline
14 based on mile segments even though piggable segments
15 are, say, 200 miles long. We can have 10, 20 MOPs
16 between 45 miles and the same number of SMYS.

17 So, if you're going to, you know, try to
18 drive towards inspection intervals based on those, I
19 just don't know how you're going to do it in the
20 liquids industry whatsoever because it changes so much
21 throughout. You know, just a point for you to consider
22 because our system is very -- is very much varied
23 throughout by that, so you know, do you pick the lowest
24 common denominator? I don't know how you're going to
25 do that, but you certainly need to be aware that --

1 that systems out there -- the majority of systems have
2 sliding MOPs and a lot of different SMYS within them.

3 And on Slide 27.

4 (Slide)

5 MR. J. JOHNSON: You know, if we have
6 mileposts and you're looking for, you know, information
7 associated with mileposts and things like that, it's
8 the same thing that everyone's getting to. What are yo
9 going to gain? Are you going to ask for an XYZ at
10 every milepost? How are you going to relate that? I
11 mean, that's something you need to think about. If I
12 give you a milepost, are you going to ask for an
13 additional tolerance with that. And then, how are you
14 going to tie that to the mapping, you know, based on
15 the way we, you know, send it in already.

16 MR. FISCHER: The way we had conceptualized
17 it was to collect simply a point that did not have an
18 XYZ component but was simply just Milepost 1, 2, 3.
19 And hearing some of the comments from some of the other
20 operators, I realize now that it does vary across the
21 industry, that sometimes those mileposts don't begin
22 from zero and continue on to the end but can begin in
23 the center, and those kinds of things, and that's a
24 good comment, something that we need to consider.

25 The way we had originally thought of it was

1 to collect mileposts thinking that it was zero, one,
2 two, three, and not an XYZ component, simply an XY
3 component, so that we could count mileposts over a
4 certain distance and assume that's how many miles are
5 within that distance.

6 MR. J. JOHNSON: And I'm in the middle of two
7 weeks of the integrity management audit on the liquid
8 side, and basically, the form that we complete prior to
9 that audit -- and they've asked for that form
10 approximately two weeks before they come in -- has all
11 that information on it. They want to know how many
12 miles of pipe, how many, you know, affected HCAs, and
13 everything else. I mean, that's the form you fill out
14 prior to your audit.

15 If you move to I think it's Slide 30. Or
16 actually, maybe back up one. I have the numbers wrong
17 here.

18 (Slide)

19 MR. J. JOHNSON: I'm not sure how you do this
20 right now. Like I say, I'm just in the middle of an
21 integrity management audit. If I use this, then I've
22 got in a lot of cases sub-meter accuracy. If I don't
23 have ground verification, they're going to kick my HCA
24 identification right out.

25 On the gas side, which we're about to do, no

1 matter what map data I have, I already know from the
2 integrity management audit on the liquid side, I cannot
3 use any type of third party data without ground
4 verification. Liquids, right now what you're showing
5 is I may have another population area that I affect.
6 May not, depending on what the spray zone is of the
7 liquids. I could affect, if I've got a creek there, I
8 could affect an HCA 20 miles away. I don't care how
9 good your map accuracy is. Your maps can't go far
10 enough to show that.

11 So unless you're going to, on the gas side,
12 do that work for us -- when I say do the work for us,
13 if I give you MAOP and if I give you SMYS, tell me
14 where I've affected an HCA, I don't know what giving
15 you better map accuracy is going to do because the
16 auditors don't use that. They don't go to the NPMS to
17 do that. They come in and they look at our maps and
18 they go through our entire process quite extensively
19 and say, how did you do this, where's your quality
20 control.

21 I just -- you don't have the resources to do
22 that. I mean, we hardly have the resources to do it
23 ourselves.

24 So I don't know what providing that has to do
25 because, once again, you've got third party data there

1 showing houses. You've got an inaccuracy there.
2 You've got, you know, some inaccuracy in what we
3 provide you, and then you're looking at it to do what?
4 To do something that we've already been mandated to do
5 on both the liquids and the gas side.

6 So I don't know -- unless you want to do it
7 for us, and we're okay with that. But otherwise, I
8 think providing that for you is just superfluous
9 information.

10 MR. WEISS: Let me comment, if I can, because
11 I would disagree with that point, and I'll -- let me
12 try to explain to you why I disagree with that point.
13 And I'm aware of the fact that you're in midstream on
14 the audit because I direct Liquid Integrity Management
15 Oversight.

16 These, as I tried to say earlier, is not any
17 map -- you know, we've had a discussion with many
18 people. You know, sort of, they imply a level of
19 precision and accuracy that's not there. So we all
20 know that the map is not the 100 percent solution.
21 What the map -- what I was trying to impart earlier is
22 the map for us and why we're trying to elicit from you
23 now the difficulties of providing that information is
24 not so much what you think, you know, that we have a
25 need for that information. We're interested in hearing

1 from you on the difficulties of providing it and the
2 cost and the alternatives.

3 What we use the information for and I was
4 trying to tell you was to allocate very limited
5 resources. You know, there is a requirement and a
6 growing requirement for a more rigorous oversight. To
7 do that effectively and allocate what are very limited
8 resources, we need to try to apply those first where
9 they can have the most public benefit.

10 So I -- I buy that when the teams arrive in
11 the field, part of their job is to make sure that the
12 data that you're submitting is accurate, you know, and
13 that it's -- it's close. So I heard someone else, or
14 maybe it was Andy, who had made that point. You know,
15 that is one of the team's jobs when they get there.
16 They do sampling. They can't afford to go through your
17 whole system and you know how to do your business. All
18 they're trying to do is a reasonable check to see that
19 you're submitting, you know, relatively accurate data.

20 That data is then used in the way that Sam
21 sort of gave a gross model for that. I mean, there are
22 a lot of other factors that go there, including local
23 information from regional directors who you work with
24 all the time. You know, it goes into the overall sort
25 of prioritization of our inspection resources.

1 But it is more about talking about where
2 should we apply our resources first. With 800, you
3 know, transmission -- gas transmission operators alone,
4 another 2- to 250 on the liquid side, there are a lot
5 of pipeline operators out there, maybe. Marty is
6 shaking her head. And those numbers change all the
7 time. We know that.

8 So, you know, I just -- I apologize for
9 taking that long just to say that we're not trying to
10 get a 100 percent answer and say, jeez, this is -- you
11 can give this out to anyone as 100 percent accurate.
12 What we're trying to do is get relative accuracy so
13 that when we do our prioritization and apply those
14 limited resources, we can do it in a way that is of
15 maximum benefit to the public. That would be my only
16 comment.

17 PARTICIPANT: (Off mike) But on the liquid
18 side -- I don't know how you would do that, develop the
19 models -- I don't know how you would find that out --

20 MR. WEISS: That's correct, that's correct.
21 And what we do in that case, as -- as the -- pardon?

22 Yeah, I -- his question had to do with
23 whether -- how we would do then the liquid side since
24 you're determining the may-affect. You know, that's
25 what you're doing.

1 What we gave you on the liquid side that's
2 different from the gas side is we sort of gave you the
3 first swag at that. We know that operators have the
4 requirement to take that information and say, may I or
5 may I not affect these high consequence areas? Because
6 there are clearly cases where you intersect an HCA that
7 -- but because of topography or other factors, you may
8 not affect it. Similarly, as you pointed out, and
9 with stream transport and overland transport, there are
10 areas outside of those perimeters that we've defined
11 that you can clearly affect. History has shown that
12 time and time again, particularly where water transport
13 is involved.

14 So, you're right, there's different models
15 operating on the gas and the liquid, and I'll
16 eventually allow you to debate that with Mike. Mike is
17 really the architect of the regulatory side.

18 What I'm saying from an oversight side,
19 though, is that we do come in and we look at your --
20 the reasonableness of your may-affect determination.
21 And we'll be doing the same thing on the gas side.

22 MR. BENNETT: (In progress) -- your general
23 comments. We've worked with OPS off and on with the
24 National Pipeline Mapping System and communicated it to
25 our members and helped implement this program. And

1 when you look back as the -- Terry mentioned, in the
2 past there was a general philosophy to have a general
3 map from the San Jacinto incident. This has been a
4 valuable tool for us to communicate.

5 I have -- we have some concerns about this
6 being viewed as a natural evolution for integrity
7 management. It really is completely different. Some
8 of the speakers have talked to that because a national
9 mapping system that really came from Congress wanted
10 you to have a national map for location really doesn't
11 lend itself into that data integration automatically.
12 And we really do need to have some long-term
13 discussions.

14 You talked about mileposts on pipelines.
15 When you look at the different sectors, you're going to
16 find completely different practices done in liquid
17 transmission and distribution industries. You will go
18 to a lot of LDCs and they will not have mileposts at
19 all. They don't exist. The pipes are in the middle of
20 cities. So that location is 17 and U Street. There is
21 no need for mileposts, so none were there.

22 So one of the things that you'll find, that
23 that data doesn't exist. They have the accuracy
24 because they built it in the cities and they don't need
25 to overlay that type of information.

1 So we really do have to have a long-term
2 dialogue to figure out what are the actual goals of
3 this, what are the benefits and the costs, and go
4 through the formal rulemaking, and this is really a
5 good time to discuss that dialogue.

6 The -- one of the reasons I say this isn't a
7 natural growth out of integrity management, especially
8 for gas, is because you look at the high consequence
9 areas. I mean, they are going to change rapidly. Just
10 two months ago, we were looking at a definition and we
11 couldn't even find out how to describe them. And now
12 we're going to look at where 20 people might congregate
13 near a pipeline. If you think about putting that on a
14 national database, it's going to change over and over.

15 So there are just some fundamental logistical
16 problems that don't lend a national mapping system to
17 something that is really localized. And operators can
18 find that local information, keep it in their database,
19 and update it efficiently in a very general way and a
20 very efficient way.

21 You -- I think you did have a lot of success
22 building a National Pipeline Mapping System with the
23 liquid integrity rule, but then when you look at that
24 structure, you're looking at permanent aquifers,
25 permanent archeological sites, and a permanent

1 pipeline. So it was -- it lent itself to a national
2 map that did not change. And the HCA definition,
3 especially with the liquid rule, that outside areas
4 where people congregate, if you start putting that in a
5 national map, you're going to have a national map that
6 is almost always inaccurate because people will move to
7 different locations.

8 So there is some value in looking at this,
9 but one of the things we really need to do is go
10 through the rulemaking process and make sure we
11 identify what our goals are because right now we're --
12 we have some vague understanding of how you want to
13 prioritize the issues but there's not a clear
14 understanding of the goals and the different
15 alternatives to meet, you know, those results.

16 So, those are some of the general issues,
17 some of the problems we already see with high
18 consequence areas, mileposts, and accuracy for maps.
19 And we're glad to sit down and talk with you and figure
20 out where we want to go in the future.

21 MR. FISCHER: If there are no other
22 questions, we'd like to go ahead and take a 10-minute
23 break. Please come back quickly. We do have another
24 hour or so of information to cover.

25 (Brief recess)

1 (Slide)

2 MR. LITTLE: I'm Roger Little, and I'll be
3 covering the discussion on the Hazardous Liquid Annual
4 Report.

5 This -- this is a meeting that follows the
6 public meeting we had on March 25th with the Hazardous
7 Liquid Technical Advisory Committee. We discussed with
8 them at that point comments that we had had in the
9 docket for the notice of proposed rulemaking for the
10 Hazardous Liquid Annual Report that was published on
11 July 26th of last year. We had a comment period that
12 was open until November the 22nd, and we received a lot
13 of good feedback.

14 We discussed a little bit with the technical
15 advisory committee what we had proposed in terms of
16 making changes to the form reacting to the comments,
17 and had a little bit more feedback at the March 25th
18 meeting that led us to a form that I'll get to shortly
19 showing you where the progress is.

20 And we also have a docket that is open now
21 for further comment that will be -- remain open for at
22 least a 30-day period as we anticipate setting up a
23 time to discuss the new form with the Technical --
24 Hazardous Liquid Technical Advisory Committee in the
25 near future.

1 (Slide)

2 MR. LITTLE: What I have up here is the
3 original form that we proposed with the notice of
4 proposed rulemaking, which was Docket Number 9832,
5 published July 26th. And I'm going to skip over the
6 initial part of the form and basically display the
7 critical part of the matrix that we had the comments
8 about.

9 The top part we had some basic information on
10 type -- system type, crude oil, HVO, refined petroleum,
11 carbon dioxide, anhydrous ammonia, categories that
12 matched the categories we generally have for the
13 hazardous liquid accident reporting so that we can use
14 this information for normalizing the accident
15 information and making better use of the trending
16 information there.

17 We also have some basic information from the
18 company identifying who the company is, the operator
19 identification number, their location, and their
20 headquarters name and address if it's different than
21 the office filing.

22 Part B and Part C depict generally a matrix
23 that we received a lot of comment on. We proposed that
24 we would get by-decade installed information by
25 cathodic protection, by bare and coated steel, also by

1 diameter. We had a lot of comments that particularly
2 talked about problems in providing the information in
3 this matrix in the form that we -- we proposed here.

4 We also requested the information to be
5 provided on a by-state basis. The complexity of the
6 matrix and the additional complexity of providing the
7 information on a by-state basis was seen as causing or
8 leading to other data errors from a national
9 perspective because companies would be forced to submit
10 data on a by-state basis where they have had no
11 business reason to maintain data in that fashion
12 before, the hazardous liquid industry being primarily
13 an interstate industry.

14 There were other comments that the current
15 risk analysis efforts primarily target integrity of the
16 pipe, not analysis on a by-state basis. The accidents
17 are few, another point that was raised. And if you are
18 trying to trend the accidents, if you -- you need to
19 really have a national perspective because of the
20 infrequency of the accidents to really get good trends.

21 And you weaken the trending if you're trying to
22 segregate down to a by-state basis because of the
23 limited number of accidents that are -- that occur.

24 I mentioned the complexity of the matrix --
25 matrices was seen as unrealistic. It would force

1 operators to guess in their attempt to comply, leading
2 to further flawed information. The for -- by -- nature
3 of the matrix adds to the complexity where we proposed
4 by decade installed for both cathodic protection, bare
5 and coated, and diameter. The information generally
6 isn't provided or kept in this fashion.

7 We had in our discussion in the rulemaking
8 talked about that we have a pre-40 or unknown category
9 and recognizing that a lot of the records for pipe that
10 was installed prior to our regulations aren't readily
11 available and this sort of thing and that we would
12 expect that there would be a high percentage in those
13 categories.

14 So, at the time we proposed this, we thought
15 it was sort of a tool there, but we've considered the
16 arguments about the weakening of the usefulness of the
17 information. And so we've got a variety of ways that
18 we've made some improvements to the form.

19 We also had another area on the form where we
20 proposed ERW pipe by decade installed. We also
21 proposed mileage by over 20 percent SMYS, less than 20
22 percent SMYS, on-shore versus off-shore, and a section
23 for miles of gathering lines regulated and unregulated,
24 and a section on breakout tanks. And we wind up -- we
25 wrapped up with a section on -- actually, we had

1 another proposed section for total volume transported
2 again proposed by state. And we wrapped up with an
3 internal inspection category where we proposed
4 information during the last 10 years of testing by
5 whatever testing methodology was used, whether it was
6 hydrotesting, internal inspection, or direct
7 assessment.

8 So, generally, this is the form that was
9 initially proposed. I'm going to switch now to the
10 form that is available in the "Federal Register" now
11 and, again, for at least a 30-day period for further
12 comment there's a docket open.

13 If I can get the mouse -- oh, here we go.

14 (Slide)

15 MR. LITTLE: And so we wind up with a very
16 much simplified form. We recognized the fact that the
17 by-state reporting is a problem. We also acknowledged
18 the fact that for hazardous liquid pipelines, generally
19 virtually close to 100 percent of the mileage is
20 already available in our mapping system. So we have a
21 source for some information for -- information on a
22 per-state basis for total mileage.

23 We have a dialogue that we've started now in
24 terms of how we can move forward and get better
25 information. We don't have the diameter information

1 and certain other attributes that would totally let
2 this submission happen through the mapping system. And
3 this is something that Steve -- that Sam is going to
4 talk about when he's up again next, you know, how some
5 of this information may be streamlined for submission
6 and how we can move forward into the future to make the
7 information more useful and more readily available.

8 We -- as I mentioned, we are dropping the by-
9 state requirement. This is what we're proposing. We
10 also have simplified the matrix. We acknowledge the
11 fact that requesting the information by decade for
12 cathodic protection, bare versus coated, and also by
13 diameter was something that would probably lead to
14 further inaccurate data and compared to the usefulness
15 of the data, having those information separated.

16 So we proposed this -- this version of the
17 form which more closely aligns with the hazardous
18 liquid -- with the Natural Gas Transmission Annual
19 Report. There are a lot of similarities between this
20 and what is currently submitted there. We have our
21 Part B, which is virtually the same. We've added here
22 total miles that could affect HCAs, broken out on-shore
23 and off-shore.

24 We have the -- a category separate now in
25 Part D for total miles by decade installed, and I think

1 there was general consensus that that information is
2 needed and is available.

3 There was a also a comment that ERW pipe
4 information would be difficult to provide. This is
5 something that we've had a lot of interest from
6 Congress expressed where we need that information to
7 track the improvements in managing ERW pipe and
8 determining the replacement frequency of that pipe over
9 time and answer questions that Congress is very intent
10 on asking us.

11 We keep the Part F, miles of pipe by
12 specified minimum yield strength.

13 For breakout tanks, we acknowledge the fact
14 that companies have an option for providing this
15 information through the mapping system. So we're
16 providing a checkbox here to allow companies to
17 acknowledge that they've submitted in that -- in the
18 NPMS and we're providing that as an alternative to
19 submitting it on the annual report. If you submit it
20 there, you don't need to submit it here.

21 Again, we're getting not by-state volume
22 transported, we're getting aggregate volume nationwide
23 by the commodities, again aligning with the commodities
24 that we capture on the hazardous liquid accident
25 report, again for normalization purposes.

1 And then, finally, we had some feedback on
2 the internal inspection data that we had proposed on
3 the notice of proposed rulemaking. And we took advice
4 from the American Petroleum Institute. We've modeled
5 our revision on the data that they currently collect
6 and maintain in the pipeline performance tracking
7 system that they've had for a couple of years. And
8 we're pleased with the overlap this has with our
9 integrity management program. It more closely aligns
10 with our business purposes.

11 So these are the changes that we're
12 proposing. We hope that we are close to a consensus
13 with industry in terms of the comments that we've had
14 to date. We've got a docket, as I've mentioned, that
15 is open for further comments, and we have a question-
16 and-answer session now if anyone has any particular
17 comments they want to state about the current form.

18 And again, you're welcome to file formal comments
19 through the docket as well.

20 MR. WEISS: Just a procedural question. I
21 wonder if it would be of value to go ahead and talk
22 about the future potential and then just sort of invite
23 comment in general because I think a lot of what you
24 see in this form is -- and the difficulties and
25 challenges of submitting that data to OPS is -- it may

1 be instructive to sort of cover the second topic and
2 then just open it up for broader discussion not only on
3 the fields but as well as the methods for submitting.

4 (Slide)

5 MR. FISCHER: I'm going to talk about the
6 potential for collecting a lot of this information
7 through the National Pipeline Mapping System. A lot of
8 the information that Roger just reviewed on his annual
9 report nicely lends itself to collection through a GIS.

10 Based on some of the comments that we've
11 already received this morning, I expect that this will
12 generate a lot of comments and a lot of discussion.
13 And again, I want to reiterate that this is something
14 that we've considered and this is a starting point for
15 discussion.

16 As I said, the NPMS can be modified to allow
17 for the collection of the data that Roger just reviewed
18 and in an electronic way. What we can do is collect
19 additional attributes on the National Pipeline Mapping
20 System and then dump, if you will, the data from the
21 National Pipeline Mapping System into an annual report,
22 the idea being that operators would have the option of
23 submitting a lot of the information on annual reports
24 through the National Pipeline Mapping System.

25 What it would mean on a basic level is that

1 NPMS submissions would need to be aligned with annual
2 reporting, meaning that they -- they would need to come
3 in at the same time and reflect the same -- the same
4 point in time and also that they would need to reflect
5 the exact same mileage. So whatever is reported under
6 the annual report for hazardous liquid would need to be
7 reflected under the National Pipeline Mapping System
8 submission.

9 (Slide)

10 MR. FISCHER: These are the data elements
11 that we would need in order to be able to dump
12 information from the NPMS into the annual report. It
13 includes diameter, requiring that, MOP, decade/year
14 installed, cathodic protection, coating, low and high
15 frequency ERW, SMYS, and mileposts. And again, a lot
16 of these we've already discussed and they've generated
17 some good comments just in general about how we would
18 collect this information. And from some of the
19 comments that we've already received this morning,
20 mileposts could potentially drop off of this slide.

21 (Slide)

22 MR. FISCHER: These bullets -- this is a
23 bulletized form of the form that Roger just reviewed
24 with you. The parts in blue are what would remain on
25 the form if we were to be able to collect the

1 attributes that I discussed here. The parts in green
2 would be optional on the form if an operator submitted
3 them through the National Pipeline Mapping System,
4 submitted these attributes through the National
5 Pipeline Mapping System.

6 Is the green visible to everyone in the back?

7 Okay, good.

8 So it's a significant portion of the annual
9 report that would potentially drop off if it's possible
10 to collect this information through the National
11 Pipeline Mapping System.

12 This bottom bullet basically states that by-
13 state reporting is solved through the National Pipeline
14 Mapping System because we can break the data into any
15 unit that we like: county, zip code, state, what have
16 you.

17 (Slide)

18 MR. FISCHER: That's generally all that we
19 wanted to discuss in terms of potential for the NPMS to
20 collect the annual report information. My guess is
21 that a good bit of discussion will probably be
22 generated around these -- these attributes here.

23 Are there any comments or questions?

24 MS. GERARD: If you can break the reporting
25 by any attribute, who else could?

1 MR. HALL: I don't understand the question.

2 MS. GERARD: Would anybody who has a password
3 to the mapping system be able to do it as well?

4 MR. WEISS: No. This data would be processed
5 internally and the results would be made available to
6 whoever we decide should have access to the
7 information.

8 MS. GERARD: Is it possible that operators
9 could use it?

10 MR. HALL: Operators that submitted their own
11 data would have access to the data that they have
12 submitted and they could generate an annual report-like
13 submission from the NPMS data that they had submitted.

14 MS. GERARD: I'm just sort of curious if
15 operators would be interested in access to this
16 information or being able to compare their information
17 to a national summary or, you know, for benchmarking
18 purposes. Is there any value for that purpose?

19 MR. WEISS: I might just add a quick comment
20 if I can. I think what Stacey's alluding to and asking
21 for any comments that you might care to offer was, for
22 lack of a better phrase, what we sort of call the
23 myOPS.gov concept.

24 An operator could, for example, have a
25 password-protected access whereby they submit most of

1 their data to us electronically. It has certain
2 benefits to the operators, it has benefits to us,
3 certainly, both in terms of accuracy and amount of
4 labor.

5 But above and beyond that, I think that model
6 can be expanded to say what information do we have
7 available on the operator. So the operator can
8 fundamentally do their own credit check, for lack of
9 anything else, and look for accuracy in the data. It
10 could -- it could certainly facilitate all the
11 transactions back and forth.

12 The second part, if I read your question
13 correctly, that concept can be enlarged to a different
14 audience, not necessarily just the operators, and
15 really, that model in terms of public access or
16 something, that would be defined by what it is we
17 decided to do and worked it through some sort of a
18 broader comment process.

19 But it is conceivable, as we've talked about
20 with the NPMS, to provide the public access to who
21 operates in their zip code in a transmission line.
22 That's something we've considered doing for a long time
23 now that post-9/11 we'll no longer be providing maps to
24 the public. We can provide them, based on their zip
25 code, access to information on what operators are in my

1 area, how do I contact them for more information, that
2 sort of an application on myOPS.gov.

3 MS. MATHESON: Marty Matheson with API.

4 From a liquid industry perspective, this is
5 the first time we've seen this proposal kind of in a
6 formal sense. The big difference between an annual
7 report as it is laid out in the notice of proposed
8 rulemaking and a mapping-based annual report is the
9 geospatial information. Clearly, this data would have
10 to be tied to a -- a GPS coordinate in order to do the
11 state-by-state information that you're suggesting. And
12 as a result, it has all of the same problems and
13 difficulties as we've already described earlier this
14 morning.

15 We think this is a concept that is very much
16 in its infancy, needs a lot of thought, and needs a lot
17 of consideration before it's proposed in any way,
18 shape, or form as a notice of proposed rulemaking.

19 I'll save the rest of my comments for my part
20 of the agenda.

21 MR. HALL: Thanks, Marty.

22 Any other questions or comments?

23 (No response)

24 MR. HALL: I can't believe we wore out the --

25 MS. GERARD: So pretty much, you like it?

1 MR. HALL: Yeah.

2 (Laughter)

3 MR. FISCHER: No, I think it's more likely
4 that we wore them out on the first session.

5 MR. J. JOHNSON: Jay Johnson with Enbridge
6 Pipelines.

7 Same question I had earlier. I'll bring it
8 up. You know, we need it to populate the annual report
9 MOP. It's not on the annual report, but you're saying
10 it needs to be in the NPMS.

11 MR. LITTLE: This was -- this was an issue
12 that actually does not directly correlate back to the
13 annual report, as you mentioned. It's something that
14 we identified that we needed for the integrity
15 management process.

16 MR. FISCHER: Oh, then that's a mistake in
17 the slide. That was --

18 MR. LITTLE: That shouldn't have been on
19 there.

20 MR. FISCHER: That should not have been on
21 the slide. Thanks for that comment. That shouldn't be
22 on the slide, then.

23 What we tried to do was marry up what
24 additional attributes we would need to collect in order
25 to dump data back to the annual report, and MOP, like

1 you said, is not required on the annual report and
2 therefore wouldn't need to be required through an
3 annual -- an NPMS annual report.

4 MR. WEISS: Sort of hearing the deafening
5 silence here, I'll just drive home and beat a dead
6 horse and say the whole point of this second part of
7 this presentation -- hopefully it was painfully
8 apparent and maybe we made the case so well -- that
9 it's easy to do. And the question becomes -- well, let
10 me suggest mechanically. I understand that what we're
11 asking for, as I see Marty shaking her head, is what
12 are the difficulties of an operator sort of complying.

13 Let me clarify, Marty. It's easy for us to
14 do mechanically. It's transporting data elements
15 amongst here to satisfy a lot of other requirements in
16 the geospatial submission. So I think what we're
17 trying to say is that once a year, if the timing were
18 worked out, operators could meet a lot of requirements
19 through a digital, you know, e-government type of
20 solution. That works in everyone's best interest in
21 the long run.

22 So I think the comments that we're keen to
23 hear about are the difficulties of doing that, the
24 costs associated with that, and, you know, then again,
25 any alternatives that occur to anyone.

1 If the deafening silence continues, we will
2 be glad to move into the presentation part of it.

3 Marty?

4 MS. MATHESON: I will say the deafening
5 silence is that we haven't sat down and worked out all
6 the problems with this. We think this is very
7 problematic. It's very expensive. And it amounts to
8 operational information going to the government who
9 doesn't operate pipeline systems.

10 So clearly, this is a very early stage of the
11 idea. If you are going to proceed with rulemaking
12 related to this, we would like to see a very, very
13 advanced notice of proposal to work on this. It's
14 going to take a long time to -- to reach agreement on.

15 MR. WEISS: I think with that we're probably
16 ready to move into the presentation phase.

17 Do you have a --

18 MR. HALL: I have a list of people who had
19 made formal requests for -- to make presentations or
20 formal comments. Some of you might have already made
21 all your comments, I'm not sure. So we'll go through
22 the list, and if you have some additional comments,
23 feel free to get up and make them. If not, we'll just
24 move on to the next person on the list.

25 David Johnson with Enron, did you have

1 additional comments?

2 MR. D. JOHNSON: No.

3 MR. HALL: Marty?

4 MS. MATHESON: These -- these are kind of
5 unofficial comments to the record, if you will.

6 I question, first, the need to go to
7 rulemaking on all of the mapping issues. When Congress
8 spoke last year, they basically said, yes, you've
9 accomplished what you needed to accomplish with the
10 National Pipeline Mapping System. We see it as a value
11 with this set of data attributes, and we want everybody
12 to provide you the information to kind of close the
13 loop.

14 Congress did not go the next step to say that
15 mapping needs to be improved in any specific way,
16 shape, or form. That's a choice on OPS's side.

17 The second comment I would like to make is
18 that the strength of the mapping program was the fact
19 that it was a voluntary initiative that we waded
20 through from a technical perspective for several years
21 to get at the solution that was affordable to the
22 industry over time and useful to the OPS as it moved
23 forward.

24 I would suggest that as an alternative to
25 rulemaking that OPS consider developing additional

1 qualities and attributes and utility of the National
2 Pipeline Mapping System through a voluntary initiative
3 that would allow the industry to make adaptations as it
4 has a business need to make adaptations. And you might
5 find that five to seven years from now, just like five
6 -- we are now seven years from the beginning of the
7 first mapping initiative, we in essence have a truly
8 national pipeline mapping system.

9 Without a rulemaking, I think we'll actually
10 have a better system in seven years than we will if we
11 mandate it sometime in the next 18 months and create
12 something that's less than perfect.

13 So I would suggest as an alternative to
14 rulemaking is to go forward in a voluntary sense.

15 The second comment I have is, I think that
16 OPS already has the ability to allocate its resources
17 for the purposes of regulating the pipeline industry.
18 From what I heard earlier today, OPS intends to
19 allocate its resources and determine inspections based
20 on -- on systems. And it's clear to me that OPS has
21 the ability to look at a system holistically and what's
22 available today on high consequence areas for the
23 liquid side and allocate resources.

24 Clearly, you can determine that one operator
25 has 40 percent of their mileage in HCAs and another

1 operator has 10 percent of their mileage in HCAs.
2 We're not talking about the difference between an
3 operator who has 37 and 38 percent. We're talking big
4 picture for allocation of resources. So I am not
5 convinced that the argument of more data attributes for
6 the mapping system will change how you allocate your
7 inspection resources.

8 The second aspect of that is that OPS is not
9 -- not using the data that it has available to it today
10 from an incident perspective to look at resource
11 allocation. Two years ago, OPS began regulating the
12 pipeline industry down to a threshold reporting
13 criteria of five gallons, which gives you a whole new
14 set of incident information for, yes, very small
15 incidents but again gives you indications of a system
16 that might have more difficulties from an incident
17 perspective than another system, which gives you a
18 finer-grained tool for allocating resources without the
19 expense of an expensive mapping approach to this
20 problem.

21 I'm going to repeat myself from earlier. The
22 -- asking the pipeline operators to move from a 500-
23 foot accuracy to a 40-foot accuracy only gives you
24 confidence in the location of the pipe. It does not
25 give you confidence about the location of the pipe in

1 relationship to the other things in the environment
2 that are mapped.

3 We know for a fact that the base maps are not
4 as accurate even probably as the pipelines. So
5 although you may have gone from a -- you may have
6 increased your confidence by 20 percent, your
7 confidence in the actual relationship between the two
8 things is not improved enough for someone from the
9 outside to have any more confidence on the totality of
10 the information that's available in the mapping system.

11 So getting pipe better doesn't get you what
12 you need from a confidence perspective with the public.

13 The map itself, the base map, the things that we're
14 trying to protect, would also have to be at a 40-foot
15 accuracy for you to get a 40-foot accuracy level of
16 confidence with the public. And I would suggest that
17 OPS can't even demand that from the other agencies that
18 provide those kind of maps.

19 One thing that was also raised this morning
20 that I question is this idea of the value of historical
21 mapping information. I think Sam or Steve indicated
22 that NPMS is a snapshot in time, and in fact that's
23 true. And it should be a snapshot in time and a
24 predictor of future performance not used for the
25 purposes of accumulating information about pipe

1 specifically that may not even be operated by the same
2 operator in the future.

3 When an operator -- when you change from one
4 operator to another, you in essence change everything
5 about that piece of pipe. You change the attitude of
6 the management, you change the engineers who are
7 involved on it, you probably change the risk-based
8 approach for an operator that the historical
9 information from a mapping perspective does not really
10 give you much for managing that pipe or considering the
11 management of that pipe in the future.

12 I'm looking at my list here.

13 The last thing, again, is a philosophical
14 perspective. I am very concerned that OPS is beginning
15 to look like a pipeline operator here. In fact, OPS
16 manage -- it regulates operators of pipeline. OPS does
17 not regulate pipe directly.

18 The responsibility for managing pipe, for not
19 having incidents, for everything about operating a
20 pipeline system lies with the operator. And I think
21 it's very important for the regulator to be clear that
22 that responsibility lies with the operator. When you
23 begin to collect large amounts of operational
24 information, you take on some of the responsibility and
25 some of the liability for the management of that pipe,

1 and I think that's a mistake from a public policy
2 perspective and a regulatory perspective.

3 MR. HALL: Thank you, Marty.

4 Phil Bennett, did you have additional
5 comments?

6 MR. BENNETT: Phil Bennett with AGA.

7 Really, I just want to give support to the
8 comments that Marty made. They really were, I think,
9 succinct and explained a lot of the concerns that we in
10 industry have about a lot of the changes.

11 We worked voluntarily with the National
12 Pipeline Mapping System and we understood what the goal
13 was, to get some general locations after the San
14 Jacinto incident, and it was a successful effort. We
15 really do have a tool that we can use and we need to
16 work cooperatively and look and understand what are the
17 other future goals.

18 Prioritization and allocation of assets,
19 there are a lot more easier ways than going through a
20 national pipeline mapping system of all the maps to
21 figure out where to use your -- your resources. And I
22 think OPS will come to that conclusion and be able to
23 do that in an efficient manner.

24 One of the -- the big concerns, as I said
25 before, I don't think the -- a national pipeline

1 mapping system is a natural outgrowth out of integrity
2 management. I think one of the things that we're going
3 to find, especially with the gas integrity management,
4 is how complicated that rule is. You did a lot of work
5 putting that rule together. We're going through some
6 of the final stages. That was the easy part.
7 Implementing this rule is going to be a huge effort on
8 operators' parts, and I'm not sure if we're going to
9 gain a lot by trying to put -- funnel information into
10 one central database.

11 I think there is going to be a lot of effort
12 at the local level. Operators are going to work hard
13 to define their HCAs. They're going to be changing
14 rapidly. We really don't have any experience right now
15 understanding how frequently the identified sites will
16 change with locations. So those are things that we
17 will have to work to implement, and that goes into my
18 final point.

19 Stability is a strength in the pipeline
20 industry. We put assets into the ground and they work
21 day after day, 365 days a year, for 60 years. And we
22 monitor them. We work -- right now we really don't
23 have stability. We're under constant change. And I
24 guess this industry is almost going through this dot
25 com phase, and technology is nice, but stability is a

1 strength that we need to leverage and look at where we
2 are, the improvements that we have made, and look at
3 those improvements rather than go to the next step very
4 quickly.

5 So I guess my general comment is I would like
6 to see some stability work and do some future planning
7 for the -- mapping system.

8 MR. HALL: Thanks, Phil.

9 Also, a request from Andrew Kendrick, Andy
10 Kendrick.

11 MR. KENDRICK: Yes, Andy Kendrick with SECRA
12 International.

13 Not being an operator and not being in the
14 regulator establishment, my statement is really sort of
15 -- I want to keep it to sort of the 30,000 foot level.

16 And also working with the Air Force and the Department
17 of Navy for the last 15 years on their mapping and data
18 standards, what I have found -- and it's just a caution
19 to OPS -- is that it's easy to let the -- the tail wag
20 the dog. To scientists and engineers -- and I'm as
21 guilty as anyone -- more data is good. I'm a
22 scientist, and so more data is just -- makes me happy.

23 But the cost of that data -- for every data
24 element you add to a database, the cost is exponential.

25 And that's not just the cost for the operators to

1 collect that data, but it's the management, the
2 storage, the retrieval, et cetera.

3 So, a caution that we learned working with,
4 like I said, the DOD is that you have to be careful
5 that the data is driven by the need, that there's a
6 value in that data. And MQAT I, I think, was very
7 effective and I think it might be valuable for -- if
8 you're, you know, evaluating additional expansion of
9 NPMS, it may be you go back to that MQAT model. You
10 know, maybe it's the same people, same organizations,
11 but that sort of model of sitting down with regulators
12 and industry to look at what the needs are. Do the
13 needs, do the -- do the benefit of those needs, is that
14 cost effective?

15 And that's really where the devil is in the
16 detail. It's easy to say, I want a ton of data, and
17 it's easy to say, well, I want this and I want this and
18 I want this. The challenge is to attach a cost to each
19 one of those data elements so that you're making sure
20 there's a value added when you're expanding a GIS for a
21 database system.

22 My only second point is that, maybe more
23 important than the accuracy of a pipeline center line
24 is knowing how accurate that pipeline center line is.
25 That is the metadata. You know, the GIS folks in the

1 room understand what I'm saying.

2 Whether the pipe is five feet, 50 feet, or
3 500 feet, that's important and that's a decision that
4 as a group we need to make. But it's really most
5 important to know that it is 50 or 100 or 200 feet. So
6 the FGDC, you know, has federal standards for metadata
7 collection.

8 I just -- I wanted to make the point that
9 it's important that the Department look at the FGDC and
10 continue -- and I know they did originally with MQAT I
11 -- continue to follow the guidance by FGDC related to
12 metadata because that's -- that'll kill you in the end
13 independent of the actual accuracy of the pipeline.

14 Thanks.

15 MR. HALL: Thanks, Andy.

16 The last person is -- certainly not least --
17 is Terry Boss. Do you have additional comments?

18 MR. BOSS: (In progress) -- within filling
19 out an annual report. That does take an awful lot of
20 work to do that, and I don't think there was too many
21 computers at that time. And so you can complete the
22 annual report and get that information.

23 And I think the industry is very interested
24 in utilizing information. And you can see that from
25 the integrity management programs. When it looks like

1 there's a definite need for that information, to pull
2 that information out, we're definitely interested in
3 doing that sort of thing, suggesting data elements
4 that'll help understand the performance of that.

5 Where we're a little bit cautious is when --
6 when data elements are going out there. And to give
7 you an example, when we do start talking about
8 integrity programs, the subset of information you're
9 talking about on some of this stuff is not enough to
10 make good decisions. What we're afraid is we'll have a
11 lot of dialogue about, well, I took this information
12 and made this decision.

13 If you really want to know why the decision
14 was made, there's a lot of information that has to be
15 gathered in those integrity programs at the location.
16 So I would hesitate on getting a subset because you'll
17 spend more time arguing about a subset of data than the
18 actual true conclusion that needs to be made that we
19 really need to make decisions on.

20 Thank you.

21 MR. HALL: Thank you, Terry.

22 Are there any other general comments or
23 questions regarding what you've heard today?

24 MR. D. JOHNSON: Yeah. Dave Johnson with
25 Enron again. I did have one other one that -- that

1 wasn't brought up, so I'll mention it.

2 In the -- the standards document that I think
3 you published in maybe January, there are some things
4 in there that are just not achievable. There are some
5 impractical dates for getting things in. I think the
6 Pipeline Safety Act required us to have our data in by
7 June 17th of this year. And I think, you know, as you
8 said earlier, virtually 100 percent of the liquid
9 operators have their data in and something on the order
10 of 70 percent of the gas operators do now. And we have
11 all of ours in.

12 But the updates that you -- that appear to be
13 required in that standards document are not discussed
14 in the Pipeline Safety Act. That's essentially the
15 agency's interpretation, I guess, of what they want.
16 And requiring complete resubmittal of data or submittal
17 of changes that have been made, the -- the dates and
18 the way that's written reflects, really, a lack of full
19 understanding of how this data gets developed, how it
20 flows, and when it becomes available.

21 But I would venture a guess that there are a
22 number of operators -- and I'll tell you right now
23 we're one of them -- that will not be able to -- to
24 meet that deadline. We have everything in and the data
25 that has been processed on the changes will be in by

1 the 17th, but there's -- I think probably most
2 operators have data that is in various stages of
3 processing for projects that have been completed but
4 the data is not done yet that will not be available on
5 the 17th, so --

6 MS. GERARD: I'm not understanding exactly
7 what in our standards differed from your understanding
8 of what the law intended that makes it difficult to
9 meet the deadline.

10 MR. D. JOHNSON: I believe, Stacey, the law
11 intended the -- everybody to essentially have their
12 system in. What had been the voluntary effort is
13 supposed to be -- is now mandatory and they said, you
14 guys who haven't -- haven't volunteered your data now
15 have six months to get it in.

16 MS. GERARD: Right. And the difference
17 between that and what's in the standard is --

18 MR. D. JOHNSON: And what -- what's in the
19 standard is a requirement for, depending on dates of
20 changes and that kind of thing, complete resubmittal of
21 everything that -- that you have done or a submittal of
22 changes.

23 MR. WEISS: Actually, what Dave is commenting
24 on is the advisory that we put out. The standard
25 doesn't specifically require it, it's the advisory that

1 came out that said how we interpreted the -- the
2 submittal.

3 MR. HALL: Right. The standard -- the
4 standards are reflecting our interpretation of what
5 Congress intended. I think if you also look at what
6 Congress had in the Act, it had not only the complete
7 submission of information, but it also had updates.
8 And I think that's where we're getting --

9 MR. D. JOHNSON: It had -- it had updates and
10 -- and this is on page 8 of this thing.

11 MR. HALL: Right.

12 MR. D. JOHNSON: The section called "Data
13 Updates in 2003," I believe. I was getting mine out.
14 Terry handed this to me.

15 There -- you know, as I said, there are some
16 operators that will be able to meet parts of this.
17 There are probably a lot of operators that have data --
18 this -- this data is not instantaneously available upon
19 completion of a pipeline project. It's just not. And
20 -- and when it's not, there's -- there's some
21 processing time, there's some lag time, and -- and that
22 is going to vary operator by operator, system by
23 system, and it depends on a lot of things. It depends
24 on a number of contractors that do work for us, that
25 sort of thing.

1 But setting a date to say, all these updates
2 have to be in by -- by June 17th I think is -- is
3 arbitrary and it's unrealistic and it's unachievable.
4 And you know, I can tell you right now, we're not going
5 -- we're not going to make it. What -- what you will
6 get from us is the data that we -- that we can put in
7 and a -- you know, like with the cover letter, we'll
8 tell you that you'll get the rest of it when we've got
9 it.

10 But I think it's -- it's ill advised to -- to
11 publish deadlines like this without a full
12 understanding of what -- what you're really requiring
13 people to do and what you're asking of them because
14 it's not achievable.

15 MR. WEISS: I don't know if you want to sort
16 of serve as the capstone here. I have a couple of
17 quick comments, if you -- if you don't mind.

18 You know, in -- the purpose of the meeting
19 today was really to start floating concepts and getting
20 debate. I think that at least in that regard, it was
21 successful. I mean, I understand that there are a lot
22 of issues. A lot of people have positions on one side
23 or another of an issue, but that's the point of having
24 a meeting, is to start the debate.

25 So, I mean, our objectives were fairly narrow

1 here. We -- we did want to hear -- one thing I think
2 that maybe the future can bring us that we didn't
3 really get today and is what we need as a regulator,
4 there's a lot of discussion on the perceived need that
5 we have for information, and I think that's a
6 legitimate discussion and should go forward. What I
7 haven't heard a lot of, except for maybe one point that
8 Andy had raised, was alternatives to achieving, you
9 know, objectives or the difficulties.

10 There's a general notion that it's expensive,
11 it's undoable, it's prohibitive, and that may be true
12 but we would need more to go on than just a general
13 global statement like that. So cost implications, that
14 -- something that we can work with I think would be
15 useful.

16 The other quick comments that I would care to
17 offer at this time would be to say that there's a lot
18 of -- we were there and worked with everyone in the
19 building of the National Pipeline Mapping System. So I
20 would say that we toiled with you in that and carried a
21 lot of effort and weight on that.

22 With that said, it had mixed success, and I
23 think the Congress recognized that in requiring the
24 submittal last year. We know for a matter of fact that
25 we have virtually all of the liquid lines. Some of

1 that data is old and things, as others have pointed
2 out, change rapidly.

3 On the gas side, we have 60 to 70 percent,
4 and we're warming up to get ready for oversight for gas
5 integrity. We need to complete that.

6 The other points I would -- would make is to
7 say that more attributes are not needed. Some of what
8 we're proposing here are attributes that are within the
9 National Pipeline Mapping System standards now but they
10 were labeled optional before. So I think in some case
11 a lot of the attributes were known. There are others
12 out there that weren't, and I think that that's a
13 legitimate discussion.

14 The last comment that I'd care to offer is
15 the business about looking like an operator. I don't
16 think that's our goal and never will be our goal. If
17 -- if we thought we had enough information to operate
18 -- or if you were in the same boat we were in, you
19 would be in trouble. I would expect a pipeline
20 operator would have infinitely greater detail on their
21 pipeline in order to operate it successfully and
22 safely.

23 Our goal is, first of all, first and
24 foremost, to say the operator is responsible for the
25 safe operation of that pipeline. And that's sort of,

1 you know, a hallmark for us. And we hold the operator
2 responsible for the safe operation.

3 But that said, we're a regulator and we
4 regulate a diverse industry. Not all operators are the
5 same. There are many great operators who safely and
6 successfully provide the energy supplies to the
7 country, you know, day in and day out, and there are
8 other operators who have histories that need to be
9 addressed. What we're trying to say to you is I think
10 that by being smarter and having a better system and
11 handle on the system that we can make better allocation
12 of resources.

13 I know I've banged that drum repeatedly, so
14 I just want to say that it's not our goal to understand
15 all the nuances of the pipeline. It is really to
16 understand better the risks that they pose in relation
17 to the people they serve and the environments they go
18 through.

19 So, we appreciate very much the comments, and
20 a lot of those are heartfelt. We appreciate it. We
21 are looking for, I think, more dialogue in the future
22 on this. We appreciate your time and attention.

23 I guess with that comment, I'd turn to Stacey
24 and see if you have any closing remarks.

25 MS. GERARD: I -- I apologize for missing the

1 beginning part of the meeting when I think that you all
2 as an audience did make a lot of comments.

3 The timing of this meeting was driven by the
4 fact that we were having the advisory committee meeting
5 this afternoon on Gas IMP. And I felt it was important
6 to give members of the advisory committee and the
7 public the opportunity to understand that as we move
8 forward with the rulemaking on Gas IMP, we had kept the
9 practical considerations of our oversight kind of on
10 the side that are tied up with mapping.

11 As we had had discussions with the gas
12 industry prior to going into rulemaking, you know, we
13 had considered different approaches to defining HCAs
14 that tied into the map, as we did with liquid. And you
15 know, we heard enough comments by the gas industry
16 about the quality of information that they had on
17 population and the granularity of that information that
18 we decided to not go on the experience we had with
19 liquid but try something different based on our
20 experience regulating gas.

21 And -- and so it was kind of a leap of faith
22 on our part about how we were going to deal with that
23 implementation problem when we get there. And our --
24 and our counsel advised us to keep the mapping issues
25 as a separate item. I believe we mentioned it in the

1 preamble or in the -- in the early notice on the Gas
2 IMP rule.

3 So here we sit this morning on the eve of the
4 vote on the biggest rulemaking in our history with
5 questions about the quality of our oversight. And I --
6 I didn't actually review the slides that were used for
7 the morning presentation which emphasize as the basis
8 resource planning. Had I edited the slides, I probably
9 would have gone more to building the credibility of our
10 position as an oversight agency.

11 And I would want to remind those of you who
12 haven't seen the transcript of the NTSB hearing on
13 Carlsbad that this question about the definition of HCA
14 was raised by the NTSB board member -- one of them --
15 in that hearing. And you know, he was somewhat
16 startled to learn that it was the operator who
17 identified and defined the HCA, and there wasn't
18 anything in the record of that meeting that reflected
19 the -- the additional fact that we challenge the
20 identification as part of our inspection process.

21 And our ability to challenge that, not be the
22 operator but challenge the work of the operator, goes
23 to the question of how good a regulator we are, whether
24 people believe we have the information we need to do
25 the job, and do we have the will to do the job. And as

1 an organization, we've been working very hard in the
2 last couple of years to clean up the record of
3 unaddressed mandates and to demonstrate that we have
4 the will to do the job.

5 And I think that that -- the effort is paying
6 off in terms of confidence that people have in that the
7 pipeline infrastructure is regulated and that it's
8 better regulated than it has been. And that, you know,
9 I think, goes to a benefit to you as you look to take
10 on new projects and grow the pipeline infrastructure as
11 it needs to grow.

12 So when we consider things like, how do we
13 improve our credibility, how are we well positioned to
14 oversee, we have to ask some of these questions. And
15 going to stability, as the AGA commenter pointed out,
16 we really believe that you need that stability in
17 regulation and it's why you see us having public
18 meeting after public meeting like this so that we can
19 have these discussions.

20 We listened to you today. There were a lot
21 of comments to go against something that we were
22 considering, and we -- we need to find other forums to
23 have these discussions. And I hope that as industries
24 you'll consider putting some time into the -- the
25 mapping team -- quality team type of concept that we've

1 used in the past because I don't think from what I've
2 heard we've gotten enough to address the needs we have
3 to move forward.

4 I wanted to make a comment to address Marty
5 Matheson from API's comment about, you know, Congress's
6 intention. When Congress, you know, prepares to enact
7 legislation, they do come to us and ask us questions.
8 And as you know, the legislative process is very, very
9 long. And they did come to us and ask us questions
10 about the National Pipeline Mapping System, and we
11 answered those questions to the best of our ability at
12 the time.

13 That was long before we'd done all this work
14 on the gas integrity rulemaking so we didn't have the
15 information then that we have now to provide advice to
16 Congress on what our needs might have been. But given
17 that one of the staff members from that committee is
18 here in this room listening to this meeting right now,
19 I think they're very interested and they probably would
20 have considered these needs if we could have expressed
21 them at the time.

22 Without their writing the law, we still have
23 very broad authority to consider other issues beyond
24 what's specifically called out in the law. And I would
25 ask for your participation in some additional

1 discussions probably in a quality team format, you
2 know, to flesh this out in the months ahead.

3 I think that that's all the comments that I
4 want to make at this time, except that I do want to ask
5 one question about the accuracy of the base maps
6 because Marty's comments about -- Marty Matheson's
7 comments about the accuracy of the base maps surprised
8 me. And I -- I thought that we were moving to a place
9 where we would be at a common accuracy with the other
10 databases that we were overlaying.

11 Is that not true, Sam?

12 MR. FISCHER: The accuracy of the base maps
13 is typically on a scale of 1:100,000, which translates
14 in national map accuracy standards to plus or minus 80
15 meters, or approximately 240 feet.

16 So Marty's point is well taken in that
17 accurate pipelines does not necessarily mean an
18 accurate depiction of -- of relation of the pipeline to
19 the high consequence areas that were defined by Office
20 of Pipeline Safety for hazardous liquid integrity
21 management. It does improve that depiction but it does
22 not get to an accurate plus or minus 40 feet in all
23 dimensions.

24 That is, I think, one of the reasons that
25 we're looking at improved accuracy for the pipelines,

1 and a lot of your comments are well taken today. It
2 was -- our original thinking had to do with gas
3 integrity management oversight and looking at the
4 pipeline in relation to features on the ground and
5 features on a -- on an accurate base map. And I hope
6 that answers your question.

7 MS. GERARD: One other comment in response to
8 Dave Johnson from Pipeco's remark about the difficulty
9 of being able to comply with the -- the standards we
10 put in the advisory for the updates. That may be a
11 valid comment, that we don't or didn't fully consider
12 the impact of projects that are in transition that
13 someone might call an update. And I think that we can,
14 you know, reconsider and issue some sort of a
15 clarification on that.

16 I think the most important thing that we need
17 to say here for the record is that we're making every
18 effort we can to communicate with operators about the
19 importance of complying with the law as it was written.

20 We spoke about it at the last advisory committee
21 meeting, we've published advisories on this, and that
22 as a minimum we want to emphasize the need to have at
23 least minimum compliance with the law by June the 17th.

24 And if there's an operator that is known to
25 be having difficulty with this, I hope they will

1 identify themselves and to contact either Sam Hall or
2 Steve Fischer and ask for -- you know, if there's some
3 assistance that we could provide them in complying.

4 So I think that's the last comment I want to
5 make for the day.

6 MR. WEISS: The only thing that I would add
7 is that any operator who has, you know -- I'm assuming
8 we don't want to do a show of hands here on who might
9 be having difficulty.

10 We have offered assistance all the way along
11 and continue to offer that assistance to operators who
12 are struggling who have paper-based maps that we can
13 work with you to digitize that information.

14 So I think that we have historically and will
15 continue to try to find ways to simplify meeting, you
16 know, the intent of that law and the regulation.

17 MS. GERARD: One -- one last question. Would
18 it be possible for the representatives of the trade
19 associations to be able to speak about any willingness
20 or interest in their part to consider these discussions
21 in the forum of a quality team such as we did in the
22 past?

23 PARTICIPANT: Yes.

24 MS. GERARD: So I'm, for the record, seeing
25 nodding heads from Phil Bennett from the American Gas

1 Association, Terry Boss from the Interstate Natural Gas
2 Association, Bob Cave from the American Public Gas
3 Association, Marty Matheson from the American Petroleum
4 Institute.

5 Is there any other type of organization here
6 that wants to express interest in working in a quality
7 team format?

8 (Pause)

9 MS. GERARD: Okay. Well then, I would say
10 that we will communicate with those organizations and
11 seek some state and public representation as we have
12 done in the past to pursue this discussion further.
13 And you won't be seeing an ANPRM, you'll see that we'll
14 put together a quality team.

15 MR. WEISS: I wonder if this is a question we
16 can also ask Steve -- I believe it's Steve -- that's on
17 the agenda at the advisory committee this afternoon.
18 We can reiterate that offer there because I think Linda
19 Kelly will be there, for example, from NARUC.

20 Pardon?

21 MR. FISCHER: On Thursday.

22 MR. WEISS: On Thursday? Well, when we get
23 to it on Thursday we can reiterate the offer because
24 there are other stakeholders I think we'd want to be
25 part of that, including NARUC.

1 MS. GERARD: Are there any representatives of
2 the public or state government in the room?

3 (No response)

4 MS. GERARD: No. Okay. Well then, that --
5 we will make a similar comment in the advisory
6 committee meeting, and then this concludes this
7 meeting.

8 Oh, yes?

9 MS. MATHESON: Just a quick question since
10 you raised this whole idea of a -- of a new mapping
11 quality team, which I think is a wonderful suggestion.
12 Are you suggesting that it encompasses all the issues
13 that were presented today or a subset of the issues or
14 issues beyond what was presented today?

15 MS. GERARD: I think it should include most
16 of the issues with the exception of the Hazardous
17 Liquid Annual Report because the pathway to complete
18 that action will be a discussion with the Hazardous
19 Liquid Advisory Committee. And as soon as we have a --
20 enough of a slate to have a committee discussion, we'll
21 have that discussion.

22 But the other items and -- I would include
23 and I would -- you know, I would add other issues to
24 it, you know, such as how to plan for operators and OPS
25 to link the NPMS with performance history, compliance

1 history, leak performance history, and to be able to
2 consider how we can use that information to report to
3 the public how we're doing with managing the safety of
4 the pipeline infrastructure.

5 MS. MATHESON: Okay. Just to clarify, it's
6 the annual -- the paper annual report that is not tied
7 to geospatial information as suggested here. And we
8 would agree with that, that we're very close to a final
9 rulemaking, and you will get some comments from us on
10 that.

11 MR. WEISS: I would like to add, though, that
12 I think we can talk about the sort of e-government sort
13 of applications in that context, what's doable, you
14 know, using the NPMS as a tool as opposed to just
15 purely a map. So I would like to consider that we keep
16 the e-government application on the list.

17 MS. GERARD: And I would -- I would very much
18 like to see planning to be able to link performance
19 history, have operators be able to see what we see as
20 we look at you as a regulator linked to the map.

21 This meeting is adjourned. Thank you.

22 (Whereupon, at 11:48 a.m., the proceedings
23 were concluded.)
24